



Riseladder School of Business and Technology

Conflict of Interest Policy and Procedure

Table of Contents

1.1 Policy Statement	3
<i>Section 2: Scope and Applicability.....</i>	4
2.1 Who This Policy Applies To	4
<i>Section 3: Definition of Conflict of Interest.....</i>	7
3.1 What is a Conflict of Interest?	7
<i>Section 4: Principles & Standards</i>	9
4.1 Core Principles	9
<i>Section 5: Declaration of Interests</i>	11
5.1 General Requirement.....	11
<i>Section 6: Managing Conflicts of Interest</i>	14
6.1 Guiding Approach.....	14
<i>Section 7: Consequences of Non-Declaration.....</i>	16
7.1 Importance of Compliance	16
<i>Section 8: Roles & Responsibilities.....</i>	18
8.1 All Staff, Associates, and Learners in Representative Roles	18
<i>Section 9: Monitoring, Review & Related Documents</i>	20
9.1 Monitoring Compliance	20

Section 1: Policy Statement, Purpose & Objectives

1.1 Policy Statement

Riseladder School of Business and Technology is committed to conducting its business with integrity, fairness, and transparency. We recognise that conflicts of interest, whether actual, potential, or perceived can undermine trust in our governance, academic standards, and decision-making. To maintain confidence in our operations, we require all members of staff, contractors, associates, governors, and learners in representative roles to declare and manage any conflicts in line with this policy.

1.2 Purpose

This policy is designed to:

- a. Define what constitutes a conflict of interest within Riseladder's academic and business operations.
- b. Provide clear mechanisms for identifying, declaring, and recording conflicts of interest.
- c. Ensure that conflicts are managed fairly, consistently, and proportionately.
- d. Safeguard the integrity of assessment, internal quality assurance, governance, partnerships, procurement, and learner experience.
- e. Comply with awarding body requirements (OTHM, Pearson) that approved centres must have a documented **Conflicts of Interest Policy** which covers **how to declare, how conflicts are managed, and consequences for failing to declare.**

1.3 Objectives

Riseladder School of Business and Technology will:

- a. Promote a culture of openness and accountability, where all staff and stakeholders understand their obligation to declare conflicts.
- b. Maintain a central **Conflicts of Interest Register** that records all declarations and management actions.
- c. Ensure no staff member or associate undertakes assessment, internal verification, admissions, complaints handling, or governance decisions where a conflict exists.

- d. Apply appropriate mitigation strategies (e.g., reassignment of duties, recusal from decision making, independent oversight).
- e. Provide training and guidance to staff and governors to ensure understanding of this policy.
- f. Demonstrate compliance with Ofqual and awarding body quality assurance standards.

1.4 Alignment and Compliance Context

- **OTHM and Pearson Centre Approval:** Having a Conflicts of Interest Policy is a mandatory requirement for centre approval.
- **Ofqual Standards:** Our approach supports regulatory expectations for integrity in assessment, certification, and learner outcomes.
- **Riseladder Values:** This policy reinforces our school's commitment to fairness, impartiality, and transparency in all its academic and operational activities.

1.5 Ownership & Governance

- **Policy Owner:** Head of School (Governance & Quality).
- **Operational Lead:** Centre Manager, responsible for maintaining the Conflicts Register, processing declarations, and implementing management actions.
- **Oversight:** Academic Oversight Board (for academic conflicts) and Governing Board/Audit and Risk Committee (for governance, procurement, and commercial conflicts).
- **Reporting:** Annual report on conflicts of interest to be presented to the Governing Board.

Section 2: Scope and Applicability

2.1 Who This Policy Applies To

This policy applies to all individuals engaged in the work of Riseladder School, including:

- a. **Employees:** All academic, administrative, and professional support staff, whether permanent, temporary, part-time or full-time.
- b. **Contractors & Associates:** External assessors, internal verifiers, consultants, moderators, visiting lecturers, and service providers.
- c. **Governance Members:** Governors, Board and Committee members, advisors, and anyone involved in institutional decision-making.
- d. **Learners (in representative roles):** Where learners participate in decision-making forums, peer assessment, or student representation activities.
- e. **Third-party partners:** Recruitment agents, articulation partners, suppliers, and organisations contracted to deliver services on behalf of Riseladder.

2.2 Areas Covered by This Policy

Conflicts of interest may arise in multiple aspects of our operations. This policy covers, but is not limited to, the following areas:

a. Teaching, Learning & Assessment

- Assessment or internal verification of work where the learner is a friend, relative, or business associate of the assessor.
- Preferential treatment or bias in setting assignments, grading, or providing feedback.
- Use of confidential learner information for personal or external purposes.

b. Admissions & Student Support

- Involvement in admissions decisions or placement where a personal relationship exists.
- Preferential treatment in access to resources, support, or progression opportunities.

c. Internal Quality Assurance (IQA) & External Quality Assurance (EQA)

- IQAs verifying the work of assessors with whom they have close personal or financial ties.
- Failure to declare personal interest when interacting with awarding body EQAs.

d. Governance & Committee Membership

- Governors or committee members taking part in decisions where they have personal, financial, or professional interest.
- Participation in policy approval or financial decisions that could benefit them or related parties.

e. Procurement & Commercial Relationships

- Awarding contracts to suppliers where a staff member or governor has a financial interest.
- Accepting gifts, hospitality, or inducements from current or potential suppliers.

f. Partnerships & Recruitment

- Agreements with recruitment agents, articulation partners, or training providers where conflicts of interest are undeclared.
- Staff members holding external roles in organisations with which Riseladder has contracts.

g. External Work & Consultancy

- Engagement in external employment, consultancy, or research that conflicts with Riseladder responsibilities.
- Use of Riseladder resources (time, facilities, branding, learner data) for private work.

h. Gifts, Hospitality & Benefits

- Acceptance of gifts, benefits, or hospitality that could reasonably be seen to influence a decision.
- Failure to record and declare gifts or benefits in line with school procedures.

2.3 Exclusions

This policy does **not** prevent staff or governors from having outside interests or relationships.

The key requirement is that:

- Such interests are **declared openly**,
- **Transparency is maintained**, and
- **Mitigations are applied** where there is a risk of conflict.

2.4 Responsibility to Declare

- It is the responsibility of every covered individual (as defined in 2.1) to declare actual, potential, or perceived conflicts of interest.
- Failure to declare may be treated as a breach of trust and subject to disciplinary action under Riseladder's staff or student policies.

Section 3: Definition of Conflict of Interest

3.1 What is a Conflict of Interest

A **conflict of interest** arises when an individual's personal, financial, professional, or other external interests could, or could be perceived to:

- Compromise their ability to act impartially in the best interests of Riseladder School, its learners, or its stakeholders.
- Undermine the integrity, transparency, and fairness of decisions taken within the school.

Conflicts may be:

- **Actual:** A direct conflict exists now (e.g., a staff member assessing the work of their relative).
- **Potential:** A conflict could arise in the future (e.g., a governor applying for a paid consultancy role at Riseladder).

- **Perceived:** Others might reasonably believe there is a conflict, even if none exists in practice (e.g., a staff member awarding marks to a learner who is a family friend).

3.2 Types of Conflicts at Riseladder

Conflicts of interest can take many forms. At Riseladder School, the following categories are recognised:

a. Personal Relationships

- Assessing, supervising, or supporting a learner with whom the staff member has a close personal relationship (family, partner, friend).
- Participating in admissions, complaints, or appeals processes involving a relative, friend, or associate.

b. Financial Interests

- Having a financial stake in a company that supplies goods or services to Riseladder.
- Benefiting financially from recruitment, placement, or partnership arrangements.

c. Professional Interests

- Acting as both assessor and IQA for the same piece of learner work.
- Holding an external role (e.g., with another education provider) that conflicts with Riseladder's responsibilities.

d. Gifts & Hospitality

- Accepting gifts, services, or hospitality that could be seen as influencing professional judgement or decisions.

e. Use of Resources

- Using Riseladder's resources (staff time, facilities, learner data, IT systems) for personal or non-Riseladder business.

f. Governance & Decision-Making

- Governors or committee members influencing decisions in which they, or a connected party, stand to benefit.
- Staff or associates sitting on panels or boards where their impartiality could reasonably be questioned.

3.3 Examples of Conflicts Specific to Riseladder

- An assessor marking the assignment of a learner who was recruited through their private agency.
- A governor participating in a decision to approve a contract for a company in which they hold shares.
- A staff member providing consultancy to a partner institution while also being involved in approving that partnership.
- A tutor recommending paid private tuition to their Riseladder learners.
- An administrator influencing admissions outcomes for applicants connected to them personally.

3.4 Why Conflicts Matter

Unmanaged conflicts can:

- Jeopardise the integrity of assessments and qualifications.
- Lead to regulatory non-compliance and potential sanctions from awarding bodies.
- Damage Riseladder's reputation and relationships with learners, partners, and regulators.
- Create unfair advantage or disadvantage for learners or suppliers.

Section 4: Principles & Standards

4.1 Core Principles

Riseladder School of Business and Technology adopts the following principles in managing conflicts of interest:

- a. Integrity:** All staff, governors, learners, and associates are expected to act honestly and uphold the highest ethical standards in their dealings on behalf of the school.
- b. Transparency:** Actual, potential, and perceived conflicts must be declared openly and recorded in the School's **Conflicts of Interest Register**. Declarations should be made at the earliest opportunity, even if individuals are unsure whether a situation constitutes a conflict.
- c. Fairness:** Decisions must be impartial and based on merit. No staff member or governor may use their position for personal gain or to confer unfair advantage on themselves, family, friends, or associates.
- d. Accountability:** Individuals are personally responsible for recognising and declaring conflicts. Leaders and managers are accountable for ensuring that conflicts are properly managed, recorded, and reported.
- e. Proportionality:** Management actions will be reasonable, practical, and proportionate to the nature of the conflict. Not all conflicts require removal from duties; some can be managed with safeguards such as reassignment or independent oversight.
- f. Compliance:** This policy aligns with OTHM, Pearson, and Ofqual expectations that centres maintain robust processes for identifying and managing conflicts of interest.

4.2 Standards of Conduct

All staff, governors, learners in representative roles, and contractors must:

1. Avoid placing themselves in situations where conflicts of interest are likely to arise.
2. Declare any conflict of interest immediately to their line manager, the Centre Manager, or the Clerk to the Governing Board (as appropriate).
3. Complete a **Declaration of Interests Form** on joining Riseladder and update it annually.

4. Refrain from participating in assessment, moderation, appeals, procurement, or governance decisions where a declared conflict exists.
5. Ensure that gifts, hospitality, or other benefits received are declared in line with school procedures.
6. Cooperate with any investigation or audit of conflicts of interest.

4.3 Application of Standards Across Functions

- **Academic Operations:** Tutors, assessors, and IQAs must remain impartial in all aspects of learner assessment and support.
- **Governance:** Board members must recuse themselves from discussions or votes where conflicts exist.
- **Procurement:** Staff involved in procurement must avoid awarding contracts to organisations in which they or their families have financial interests.
- **Recruitment and Partnerships:** Recruitment agents, partners, and external associates must disclose any interests that could influence learner enrolment or institutional agreements.

4.4 Consequences of Non-Compliance

Failure to comply with these principles and standards may result in:

- Disciplinary action under staff or student regulations.
- Invalidation of assessment or committee decisions.
- Termination of contracts with suppliers or partners.
- Referral to awarding organisations for further investigation.
- Damage to professional reputation and, where applicable, regulatory sanctions.

Section 5: Declaration of Interests

5.1 General Requirement

All individuals covered by this policy (see Section 2) must **formally declare** any actual, potential, or perceived conflict of interest. Declarations ensure that risks are identified early, appropriately managed, and recorded for transparency and regulatory compliance.

5.2 When to Declare

a. On Appointment:

- All staff, contractors, governors, and associates must complete a **Declaration of Interests Form** as part of their induction.

b. Annual Renewal:

- Interests must be reviewed and re-declared annually during the school-wide compliance cycle.

c. As They Arise:

- Any new or emerging conflicts must be declared immediately when they occur, even if they seem minor or uncertain.

5.3 Declaration Process

a. Step 1: Completion of Form

- Individuals must complete the **Declaration of Interests Form**, providing details of the interest, the nature of the relationship, and the potential impact.

b. Step 2: Submission

- Staff: Submit to the **Centre Manager**.
- Governors: Submit to the **Clerk to the Governing Board**.
- Contractors/Associates: Submit to their designated Riseladder contract manager.

c. Step 3: Recording

- The Centre Manager will log the declaration in the **Conflicts of Interest Register** and assign a reference number.

d. **Step 4: Review & Decision**

- The declaration will be reviewed by the Centre Manager (for staff), or the Chair of the Governing Board (for governors), who will decide on the appropriate management action (see Section 6).

e. **Step 5: Communication**

- The outcome and required actions will be confirmed to the individual in writing, and the decision will be stored alongside the declaration record.

5.4 Information to be Declared

Declarations should include, but are not limited to:

- Relationships with learners, colleagues, suppliers, or partners that could present conflicts.
- Financial interests in organisations providing goods or services to Riseladder.
- Outside employment, consultancies, or board memberships.
- Offers of gifts, hospitality, or other benefits.
- Any situation that could reasonably be perceived as influencing impartiality.

5.5 Conflicts of Interest Register

- The Register will be maintained by the Centre Manager and reviewed annually by the **Audit and Risk Committee** of the Governing Board.
- Entries will include:
 - Name of individual.
 - Role in Riseladder.
 - Nature of interest declared.
 - Date declared.

- Management actions agreed.
 - Review date and outcome.
- The Register will be available for inspection during awarding body audits, EQAs, and internal quality assurance reviews.

5.6 Confidentiality & Data Protection

- Declarations will be treated as confidential and stored securely in compliance with Riseladder's **Data Protection Policy**.
- Access is restricted to the Centre Manager, Head of School, and designated members of the Governing Board.

Section 6: Managing Conflicts of Interest

6.1 Guiding Approach

Riseladder School of Business and Technology recognises that conflicts of interest are not inherently improper. The critical issue is **failure to declare** and **failure to manage** them appropriately. Once declared, each conflict will be assessed and managed in a way that preserves integrity, impartiality, and transparency.

6.2 Management Process

Once a declaration has been submitted (see Section 5), the following steps will be applied:

Step 1: Review

- The Centre Manager (or, for governors, the Chair of the Governing Board) will review the declaration.
- The seriousness of the conflict will be assessed (actual, potential, or perceived).

Step 2: Decision

- A management action will be determined, ranging from simple disclosure in meeting minutes to full withdrawal from involvement in the activity.

Step 3: Recording

- The agreed action will be documented in the **Conflicts of Interest Register**.

Step 4: Monitoring

- The Centre Manager will monitor compliance with the agreed management action until the conflict has ceased.

6.3 Mitigation Options

The following measures may be applied to manage a conflict:

a. Recusal

- The individual removes themselves from decision-making or discussion where the conflict exists (e.g., governors abstaining from a vote).

b. Reassignment of Duties

- Duties are reassigned to another staff member or IQA (e.g., an assessor does not mark the work of a learner who is a relative).

c. Independent Oversight

- An independent member of staff, IQA, or external moderator is appointed to oversee the activity.

d. Disclosure in Records

- The conflict is openly declared and noted in committee minutes, assessment records, or procurement files.

e. Restrictions

- In some cases, individuals may be restricted from accessing certain information, systems, or meetings related to the conflict.

f. Withdrawal

- Where a conflict cannot be adequately managed, the individual may be required to step down from the role, activity, or project in question.

6.4 Escalation of Complex Cases

- If the Centre Manager determines that a conflict presents significant risk to the integrity of assessment, governance, or compliance with awarding body standards, the issue will be escalated to:
 - **Head of School (Governance & Quality)** for operational matters.
 - **Audit & Risk Committee** for institutional or governance-related matters.
- Where necessary, awarding organisations (OTHM, Pearson) may be notified in line with centre obligations.

6.5 Learner-Related Conflicts

- Staff must not assess, verify, or advise learners where they have a personal relationship.
- Any such cases must be declared and reassigned.
- Appeals or complaints relating to such learners must be reviewed by independent staff or external parties.

6.6 Monitoring and Audit

- All managed conflicts will be subject to periodic review to ensure actions remain effective.
- The **Conflicts of Interest Register** will form part of the evidence base during External Quality Assurance (EQA) visits and awarding body audits.

Section 7: Consequences of non-declaration

7.1 Importance of Compliance

Failure to declare and manage conflicts of interest poses serious risks to the integrity of Riseladder School's operations, including assessment validity, learner outcomes, and institutional reputation. It also places the School at risk of non-compliance with awarding body and regulatory requirements.

7.2 Possible Outcomes of Non-Declaration

If an individual fails to declare a conflict of interest, or acts in a way that undermines the policy, the following consequences may apply:

a. Academic & Operational Impact

- Invalidation of assessment or verification decisions.
- Nullification of committee or governance decisions made under conflict.
- Re-allocation of learner assessments or withdrawal of learner results if impartiality cannot be assured.

b. Disciplinary Measures

- For staff: disciplinary action in line with the Staff Code of Conduct and HR policies, which may include written warnings, suspension, or termination of employment.
- For learners: disciplinary procedures under the Learner Code of Conduct, which may include warnings, exclusion from certain activities, or withdrawal from the programme.
- For contractors/associates: termination of contracts or exclusion from future work with Riseladder.
- For governors: removal from the Governing Board or committees where a breach has occurred.

c. Regulatory and Awarding Body Consequences

- Referral to awarding organisations (OTHM, Pearson) for investigation, with possible sanctions including:
 - Annulment of learner certificates.
 - Additional monitoring or conditions imposed on the Centre.
 - Suspension or withdrawal of Centre approval.

d. Reputational Consequences

- Damage to Riseladder's standing with learners, partners, and regulators.
- Loss of trust in the fairness and transparency of the School's processes.

7.3 Aggravating Factors

Sanctions will consider:

- Whether the conflict was intentional or negligent.
- The seriousness of the conflict and the impact on learners, staff, or the school.
- Whether the individual has breached the policy previously.
- The extent of cooperation shown once the breach was identified.

7.4 Mitigating Factors

Sanctions may be reduced where:

- The individual declared the conflict late but cooperated fully once identified.
- The breach was minor with no material impact on learners or institutional integrity.
- Corrective actions were taken promptly to mitigate the effects.

Section 8: Roles & Responsibilities

8.1 All Staff, Associates, and Learners in Representative Roles

Every individual working with or for Riseladder School of Business and Technology has a duty to:

- Act with integrity and avoid placing themselves in situations that could create actual, potential, or perceived conflicts of interest.
- Familiarise themselves with this policy and comply fully with its requirements.
- Complete a **Declaration of Interests Form** at induction and annually thereafter.
- Declare new conflicts immediately as they arise.

- Follow any mitigation measures put in place by management (e.g., recusal from duties, reassignment).
- Refrain from accessing or using confidential Riseladder information for personal gain.

8.2 Centre Manager

The Centre Manager is responsible for:

- Receiving and reviewing staff and associate declarations of interest.
- Maintaining the **Conflicts of Interest Register** in secure form.
- Recording management actions and ensuring they are implemented.
- Providing advice and guidance to staff on conflicts of interest.
- Escalating serious or complex cases to the Head of School or Governing Board.
- Reporting annually to the Governing Board on conflicts declared and actions taken.

8.3 Head of School (Governance & Quality)

The Head of School will:

- Own this policy and ensure it is reviewed in line with awarding body requirements.
- Provide leadership and ensure consistent application across all departments.
- Oversee training and awareness sessions for staff and governors.
- Monitor compliance with awarding body and Ofqual regulations.
- Approve corrective actions in serious cases or refer them to awarding organisations where required.

8.4 Internal Quality Assurers (IQAs)

IQAs play a critical role in safeguarding the integrity of assessments. They must:

- Check that assessors are not marking work where conflicts exist.
- Ensure declared conflicts are respected in sampling and verification.
- Report concerns about undeclared conflicts directly to the Centre Manager.

- Document evidence of compliance for audit and external quality assurance reviews.

8.5 Governing Board and Committees

The Governing Board, through its Audit & Risk Committee, will:

- Provide independent oversight of conflicts of interest across the School.
- Maintain declarations from governors and ensure these are updated annually.
- Ensure conflicted governors or committee members recuse themselves from relevant decisions.
- Receive and review the annual report on conflicts from the Centre Manager.
- Hold the Head of School and Centre leadership accountable for compliance.

8.6 Contractors, Partners & Recruitment Agents

External parties working with Riseladder School of Business and Technology must:

- Declare any personal, financial, or professional interests that could create a conflict.
- Cooperate fully with Riseladder's conflict of interest processes.
- Accept that failure to declare conflicts may result in termination of contracts or agreements.

Section 9: Monitoring, Review & Related Documents

9.1 Monitoring Compliance

- The **Centre Manager** will monitor implementation of this policy on an ongoing basis.
- All conflicts declared, along with management actions, will be logged in the **Conflicts of Interest Register**.
- The Register will be reviewed annually and presented to the **Audit & Risk Committee** of the Governing Board.
- Random checks may be carried out during Internal Quality Assurance (IQA) reviews to ensure assessors and verifiers are not involved in conflicted cases.

- Compliance with this policy will form part of evidence for **External Quality Assurance (EQA) visits** and awarding body audits.

9.2 Review of Policy

- This policy will be formally reviewed **every two years**, or sooner if required by:
 - Changes to Ofqual or awarding body regulations.
 - Feedback from External Quality Assurance reports.
 - Identified risks or incidents at Riseladder School.
- The review will be led by the **Head of School (Governance & Quality)** and approved by the **Governing Board**.
- Any updates will be communicated to all staff, governors, learners in representative roles, and contractors.

9.3 Training & Awareness

- All new staff, governors, and associates will receive training on this policy during induction.
- Annual refresher sessions will be delivered to ensure continued awareness.
- Targeted training will be provided where new or complex conflict scenarios arise.

9.4 Related Documents

This policy should be read in conjunction with:

- **Assessment Policy**
- **Internal Quality Assurance (IQA) Policy**
- **Complaints and Appeals Policy**
- **Staff and Learner Codes of Conduct**
- **Data Protection Policy**
- **Procurement & Financial Regulations**