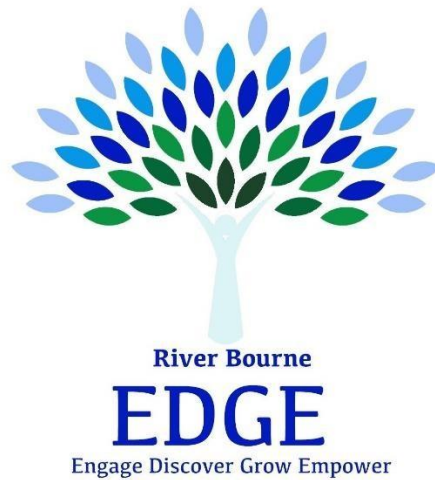




River Bourne Edge Alternative Provision

Conflict of Interest Policy

Policy Owner: Head of Provision
Approved by: Senior Leadership Team
Policy Date: July 2026
Review Date: July 2027

1. Purpose

The River Bourne Edge is committed to ensuring that all qualifications and awards are delivered, assessed and quality assured fairly, consistently and with integrity.

This policy sets out how actual, potential and perceived conflicts of interest will be identified, declared, managed and monitored to protect the integrity of assessment decisions and maintain confidence in qualifications awarded through ASDAN and other awarding organisations.

2. Scope

This policy applies to:

- All staff involved in teaching, assessing or quality assuring qualifications.
 - Internal Quality Assurers (IQAs).
 - The Head of Provision.
 - Directors and Trustees where relevant.
 - Volunteers involved in assessment activities.
 - Learners where a conflict may exist.
 - Any external professionals involved in assessment or verification.
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3. Definition of a Conflict of Interest

A conflict of interest occurs where an individual has an interest, relationship or personal involvement that could compromise, or be perceived to compromise, their impartiality, judgement or decision-making.

Conflicts may be:

- Actual
- Potential
- Perceived

All three must be declared.

4. Examples of Conflicts of Interest

Examples include, but are not limited to:

Staff

- Assessing a family member.
- Assessing a close friend.
- Assessing someone they have a financial interest in.
- Assessing their own child.
- Personal disputes with a learner.
- Supervising the assessment of someone they have previously coached privately.

Internal Quality Assurers

- Internally quality assuring work they have personally assessed.
- Quality assuring work completed by a close relative.

Managers

- Influencing assessment outcomes.
- Pressuring staff to alter assessment decisions.

Learners

- Attempting to influence assessment decisions.
 - Offering gifts or incentives.
 - Having a family member involved in assessment decisions.
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5. Declaring a Conflict of Interest

All staff must declare any actual, potential or perceived conflict of interest as soon as it becomes known.

Declarations must be made:

- Before assessment activities begin.
- Before internal quality assurance takes place.
- Before external verification visits.
- Whenever circumstances change.
- During recruitment where relevant.

Declarations should be submitted using the Conflict of Interest Declaration Form.

6. Responsibility

The **Head of Provision (ASDAN Centre Coordinator)** is responsible for:

- Receiving declarations.
- Recording declarations.
- Assessing the level of risk.
- Deciding appropriate actions.
- Maintaining the Conflict of Interest Register.
- Informing the awarding organisation where required.

Where the conflict involves the Head of Provision, responsibility will pass to a Director of the organisation.

7. Assessing the Conflict

Each declaration will be considered individually.

The following factors will be considered:

- Nature of the relationship.
- Level of involvement.
- Risk to impartiality.
- Risk to the integrity of assessment.
- Public perception.
- Impact on learners.

A decision will then be recorded.

Possible outcomes include:

- No further action required.
- Monitoring arrangements introduced.
- Additional quality assurance.
- Independent assessor appointed.
- Assessment reassigned.
- Internal quality assurance reassigned.
- Removal from assessment activities.

8. Managing Conflicts of Interest

Where a conflict exists, The River Bourne Edge may:

- Allocate another assessor.
- Allocate another Internal Quality Assurer.
- Introduce additional sampling.
- Require independent moderation.
- Increase management oversight.
- Prevent the individual from participating in assessment decisions.

The action taken will be proportionate to the level of risk.

9. Undeclared Conflicts of Interest

Failure to declare a conflict of interest may be treated as misconduct.

Where an undeclared conflict is identified, The River Bourne Edge will:

- Investigate the circumstances.
- Review assessment decisions.
- Take corrective action where necessary.
- Inform the awarding organisation if required.
- Implement disciplinary procedures where appropriate.

Where learners are affected, appropriate remedial action will be taken to ensure fairness.

10. Reporting to ASDAN

The River Bourne Edge will notify ASDAN without delay where a conflict of interest could affect:

- Assessment decisions.
- Internal quality assurance.
- Certification.
- Centre compliance.
- External quality assurance.

The Head of Provision will be responsible for making the notification and maintaining records of any correspondence.

11. Record Keeping

The Head of Provision will maintain a confidential Conflict of Interest Register.

Records will include:

- Declaration forms.
- Date received.
- Nature of the conflict.
- Risk assessment.
- Decisions made.
- Actions taken.
- Review dates.
- Closure of the conflict where appropriate.

Records will be stored securely in accordance with GDPR and retained in line with the organisation's data retention policy.

12. Appeals and Complaints

Any individual who disagrees with a conflict of interest decision may submit an appeal using The River Bourne Edge Appeals Procedure.

Appeals should normally be submitted within **10 working days** of the decision.

Where an individual remains dissatisfied after the internal process has been completed, they may raise the matter with the relevant awarding organisation where appropriate.

13. Monitoring and Review

This policy will be reviewed:

- Annually.
- Following any significant incident.

- Following updates to ASDAN requirements.
 - Following recommendations from External Quality Assurance.
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Conflict of Interest Procedure

Step 1

Conflict identified.



Step 2

Complete a Conflict of Interest Declaration Form.



Step 3

Submit to the Head of Provision.



Step 4

Risk assessment completed.



Step 5

Decision recorded.



Step 6

Control measures implemented.



Step 7

Conflict recorded on the Register.



Step 8

Notify ASDAN if required.



Step 9

Review and close when appropriate.