

ATHE Conflict of Interest Policy

Purpose

This policy is set within the context of ATHE's aim to develop and award fit for purpose qualifications that meet the needs of the learners, centres, employers, higher education and the sectors in which they operate. The policy aims to:

- ensure all ATHE stakeholders, including directors, members of the committees, employees, associates and other individuals who interact with ATHE, understand how this awarding organisation defines and manages conflicts of interest
- provide guidance to ATHE staff, associates, staff in centres and other stakeholders on how to deal with any possible conflicts of interest.
- ensure ATHE is compliant with Condition A4.

This will enable ATHE to safeguard the integrity of its qualifications and the decisions which are taken with regard to the production and award of these qualifications.

Definition

ATHE defines a conflict of interest as a position where an individual or an organisation, has competing interests or loyalties. In these cases, there is a conflict of interest and this may influence decisions, so they become invalid.

Conflicts of interest can arise in a variety of circumstances and the list below is provided as examples and is not exhaustive.

- When an individual is contracted by ATHE to work on its behalf but has competing and/or other interests in a separate organisation(s) which are directly pertinent to the work of ATHE.
- Where someone carries out qualification development, writes assignments and/or undertakes verification work on ATHE's behalf, but has friends or relatives studying for ATHE qualifications.
- Where an individual has a position in another organisation and may seek to influence decisions at ATHE for financial and/or personal reward.
- Where a director and/or shareholder of the centre is involved in assessment or internal verification
- Where an individual has confidential information for example on assessment material and is also involved in teaching, delivering training events or providing guidance on that qualification.

ATHE believes that stakeholders must maintain the integrity of the awarding organisation, the qualifications, as well as their own integrity. The policy aims to support this principle.

Recognising and Managing Conflicts of Interest

ATHE acknowledges that it is not always possible to preempt when a conflict of interest is likely to arise. However, when a conflict or potential conflict is identified this needs to be managed.

The ATHE Board

1. The Board has ultimate responsibility for ensuring the Conflict of Interest Policy is fit for purpose, is appropriately disseminated and managed effectively.

Individuals

1. Individuals involved in the management, governance, delivery, development, verification, quality assurance or promotion of ATHE qualifications must read and take note of the ATHE Conflicts of Interest Policy.
2. Individuals will complete a conflicts of interest form when being contracted for their role and this will be held on file for the duration of their work with ATHE.
3. They should always disclose an activity if they are in doubt about whether it represents a conflict. It is the responsibility of individuals such as associates, directors, committee members or staff to inform ATHE, when their roles and responsibilities at other organisations change and may create a potential conflict of interest. In particular, ATHE must be informed if anyone involved in any aspect of the development, verification, marketing, management or governance of the qualifications:
 - is closely related to, or is teaching/training any learner who is preparing for a form of assessment
 - receive scripts or other forms of work submitted for assessment from learners who are known on a personal basis
 - is related to any person who is a director, employee or associate of ATHE
 - would be affected by a personal interest or personal association in any other way

Individuals should report any potential or actual conflict of interest to the HR and Operations Coordinator and/or the Responsible Officer. This will be recorded and held on file.

Managers

1. Managers must ensure that all stakeholders are informed about the contents of the policy. All ATHE staff and associates are required to sign a declaration stating any potential Conflict of Interest that has or may occur when they enter into a contract with ATHE. ATHE requires all centres to have systems in place to identify and manage any potential conflicts of interest in assessment and internal verification. These policies and systems will be reviewed by ATHE to ensure they are fit for purpose and judgements will be recorded in reports.

2. ATHE encourages the continuous development of centre staff and would not wish to prevent staff from studying for an ATHE qualification. However, ATHE must be informed when this takes place and the centre must explain how the assessment and internal verification processes will be managed.
3. Staff in centres with a financial interest in the outcome of assessment, such as directors and shareholders should not normally make assessment or internal verification decisions for ATHE qualifications. If they have a role in the centre as principal, internal verifier, or assessor this must be declared to the EV at the health check and/or monitoring and development visit. The centre must also inform ATHE by contacting the Centre Support Team on admin@athe.co.uk.
4. In the circumstances described in point 3, ATHE will take additional measures to ensure the integrity of the qualifications and certification. This may include:
 - Refusing to grant any form of direct claims status
 - Increasing sampling at external verification of learner work
 - More regular Monitoring and Development visits.
 - Requiring the centre to prevent specific individuals from making assessment or internal verification decisions.

In most cases, it is envisaged that simple measures will be enough to manage conflicts of interest. It may be that the activity can be managed differently so that conflicts of interest are avoided. In circumstances where the conflict of interest risks the validity of an ATHE qualification and systems cannot be put in place to avoid the conflict, an individual should be prevented from undertaking specific activities.

Responsible Officer

1. The Responsible Officer will report any actual or likely conflicts of interest to the Board and to the regulatory authorities as necessary.
2. All cases of actual or likely conflicts of interest will be checked and/or investigated and a judgement and/or report will be produced as appropriate.

Conflicts of interest in centres

ATHE requires all centres to have policies on conflicts of interest and they are checked during the health check process. ATHE expects centres to implement these policies and this will be checked as part of the monitoring and development visits.

The table below provides illustrations of potential conflicts of interest in centres and how they might be managed. If you would like guidance on a possible conflict of interest please email info@athe.co.uk.

Scenario	Why is this a potential conflict of interest?	How can this conflict of interest be managed?
An assessor of a programme is the uncle of a learner studying the qualification.	There may be a perception that the assessor is biased and will not make valid judgements due to his family relationship with the learner.	A different assessor makes judgements on this learner's work. The work is then part of the normal internal sampling processes.
The Principal of the college is one of the owners and takes on the role of an assessor or internal verifier.	The college receives funding when learners achieve this qualification and there are marketing benefits from high levels of learner achievement.	The Principal does not participate in assessment or internal verification decisions for the funded qualification or the Principal informs ATHE that he is undertaking a role involving assessment or IV. ATHE implements additional measures.
A lecturer at the college is studying for a L7 ATHE qualification by distance learning. ATHE supports this activity as part of her personal development and career progression.	The assessor and internal verifier at the college are colleagues of the lecturer.	The lecturer needs to register with another ATHE centre or the lecturer needs to send their work to ATHE for assessing.

Monitoring the Policy

The policy and procedures will be reviewed every two years or as required as part of the document management process. This will ensure that the policy continues to be fit for purpose and reflects the types of conflicts that may arise and how those conflicts are managed

Revision History		
Version Number	Revision Date	Review Date
Version 3.0	30 th April 2015	30 th April 2016
Version 3.1	3 November 2017	3 November 2018

