



Rambert Grades Conflict of Interest

Policy

2024

Introduction

The purpose of this policy is to define where a potential conflict of interest may arise within Rambert Grades and protect individuals and the organisation from bias. This policy applies to all Directors, Examiners, Staff and other contracted individuals. Conflicts of interest may arise where an individual's personal or family interests and/or loyalties can conflict with those of Rambert Grades. Rambert Grades activities and those of its employees must be free from conflicts of interest that could affect their judgement and objectivity, and particularly in relation to decisions as an Awarding Organisation.

Rambert Grades recognises that some individuals may take part in legitimate activities and work outside their role with Rambert Grades but any potential conflict of interest must be declared upon appointment, or promptly as and when they arise. The most important feature of the policy is the instruction that individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest.

The policy upholds the Conditions of Recognition set by external regulators in identifying and managing conflicts of interest in relation to Rambert Grades Awarding Organisation status and the provision of regulated qualifications.

Definition of conflicts of interest:

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A conflict of interest exists in relation to an Awarding Organisation where:

- (a) its interests in any activity undertaken by it, on its behalf or by a member of its group have the potential to lead it to act contrary to its interests of the development, delivery and award of qualifications in accordance with its Conditions of Recognition
- (b) a person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisation's Conditions of Recognition, or
- (c) an informed and reasonable observer would conclude that either of these situations was the case.

Please see the [Ofqual Handbook: General Conditions of Recognition](#) for further details

Identification of conflicts of interest

Rambert Grades will carry out continuous monitoring of operations and employees to ensure that any conflicts of interest in relation either to the organisation's activities, or to the activities of employees and others working for Rambert Grades are identified and alleviated as soon as possible. This includes, for example, anything relating to training activities especially where Examiners may be involved.

To do this, Rambert Grades will carry out the following activities:

- a) in the course of normal operations, the Head of Quality Assurance and Enhancement will monitor that activities undertaken by the Awarding Organisation do not conflict with its other functions. Any conflicts identified will be flagged to the CEO directly and dealt with, via the Risk Register
- b) in relation to identification of potential conflicts of interest in relation to those working for it, Rambert Grades will identify potential conflicts of interest as follows:-

For all Board of Directors

Rambert Grades is managed by a Board of Directors who are responsible for organisational strategy and planning. The monitoring of the conduct of members is the responsibility of the Chair.

- on appointment each Director is requested to declare any relationships, and posts, held, that could potentially result in a conflict of interest. They

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are required to inform the organisation of any subsequent changes of status that are likely to be problematic.

- In the course of meetings or activities, Directors will disclose any interests in a transaction or decision where there may be a conflict between the organisation's best interests and the Director's best interests or a conflict between the best interests of the two organisations that the Director is involved with. The Chair of the meeting will decide if the member should leave the meeting for the particular item and if this is the case, redacted minutes will be issued to this member

Examples of conflicts of interest could include:

- A Director who is also on the committee of another organisations that is competing for the same funding
- A Director who is also the owner of another organisation that is a potential customer/competitor

In cases where the interests of the organisation could be compromised operational decisions will be taken by Directors who are free of conflict of interest issues.

For all Examiners:

- As part of the initial appointment process, CVs will be checked by the Head of Examinations and Education to identify any possible conflicts of interest. Where uncertainty remains, these will be explored as part of the interview process
- Upon appointment, Examiners sign a contract which specifies rules in relation to their Rambert Grades work. This contract will be issued annually and confirms that they will not knowingly accept a booking for an examination session where they have knowledge of the candidates
- Where a conflict of interest is declared or arises, and where this relates to examining candidates this will be dealt with by the Head of Quality Assurance and Enhancement
- Where an Examiner/Teacher who delivers, or expects to deliver the qualification is involved in the development of the qualification, that development work must be subject to scrutiny by the [Qualification Review and Approval Board](#) to ensure that it meets the needs of all learners and has no bias towards any specific group or type of learners
- Where Rambert Grades training / Continuing Professional Development

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(CPD) courses are delivered by an Examiner, records of attendees are maintained to enable audit of any potential candidates if necessary

For other personnel:

- On initial appointment to Rambert Grades or a Committee or working group, contractors/members will be expected to declare any conflicts of interest that may prevent them from carrying out their roles with objectivity. CVs and other documentation will be checked by the CEO to ensure that there are no potential conflicts of interest.
- Similarly, senior staff applying to work for Rambert Grades will complete a declaration during the application process. Employment of new staff in the event of a potential conflict will be subject to the agreement of the CEO.

Monitoring of conflicts of interest

(a) For all Examiners:

- Rambert Grades do not allow Examiners to examine if:
 - they have been involved in the teaching of a candidate within the last 12 months, inclusive of at Rambert Grades training and/or CPD
 - candidates they know on any personal basis, for example family or friends, or relatives of family and friends
 - for teachers with whom they have a personal, or professional employment relationship
- In order to reduce the likelihood of any conflicts of interest, on receipt of a candidate list, Rambert Grades Examiners and assessors must declare if for some reason they know a candidate. In this case, the Examiner/assessor is substituted

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In addition, Rambert Grades uses the following monitoring and administrative procedures to further protect against any potential conflict of interest:

- Records of attendees on Rambert Grades training and CPD courses are maintained to enable audit of any potential candidates if necessary, especially where the course is delivered by an Examiner.
- Examination sessions are monitored to check examiners allocation to sessions

The actions taken may be the following, depending on the severity of the circumstances:

- The candidate(s) allocated to another Examiner
- Should any ongoing monitoring find any conflicts of interest arising, actions will be taken to ensure that whilst being resolved, there is the minimum necessary impact on learners. This may result in candidates work being re-examined by another examiner and may impact on results and certification timescales. Should this be the case, Rambert Grades will inform the teacher accordingly.

(b) For other personnel:

- Staff, Contractors, Committee and Group members will be expected to declare any gifts or hospitality over a defined value upon receipt
- At any meeting the members must declare any potential conflict of interest in an agenda item, the Chair of the meeting will decide if the member should leave the meeting for the particular item and if this is the case, redacted minutes will be issued to this member
- Service providers / consultants will be required to declare any conflicts of interest, at the time of entering into their contract
- Existing employees will be required to declare any change in their circumstances immediately to the Head of Quality Assurance and Enhancement, and any issue arising will be resolved by the CEO

Confidentiality

Directors, Examiners and staff are required to confirm that they do not (except in the proper course of their duties), either during their Directorship/employment or at any time after its termination, improperly use or disclose any confidential Information relating to Rambert Grades and its operations.

Version Number	2
Date Created	June 2021
Date Reviewed	Nov 2023
Next review date	June 2024