



CONFLICT OF INTEREST POLICY

Policy reference UKV-QA-21 | Version 3.0

UK Versity Online Limited | BAC Accredited College | UKPRN 10052768

Policy reference	UKV-QA-21
Version	3.0
Status	Consolidated
Effective date	1 October 2026
Next review	September 2027
Policy owner	Quality Manager
Author	Director of Education
Approved by	Principal (Ramanjeet Singh), on behalf of the Academic Board
Approval date	1 October 2026

Conflict of Interest Policy

UK Versity Online Limited | ATHE 889 | Pearson 07737 | OTHM DC1506132 | Ascentis 3286 | NCFE 8465520 | IFA Direct 283334

Document control

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Effective date	1 October 2026
Next review	September 2027 (annual), or earlier if required
Owner	Quality Manager
Author	Director of Education
Approval authority	Academic Board, chaired by the Principal (Ramanjeet Singh)
Approval date	1 October 2026
Applies to	All UK Versity directors, staff (employed, freelance and contracted), assessors, internal quality assurers, invigilators, Academic Board members, agents and associates
Supersedes	Conflict of Interest Policy (QA-T89, 2013, reviewed 2026); Conflict of Interest in Assessment Policy and Procedure (QA-T89, November 2014, reviewed April 2026)
Summary	Sets out how UK Versity identifies, declares, records and manages organisational and assessment conflicts of interest so that decisions and assessment outcomes are impartial.

Compliance mapping

BAC College Scheme 2023 standards	1.6; 11.7
UK Quality Code 2024 (voluntary)	Principles 1, 11
OfS conditions (benchmark only; not OfS registered)	B4 (benchmark)
Awarding organisations	ATHE; Pearson; OTHM; Ascentis; NCFE; IFA Direct
Legislation and regulation	Ofqual General Conditions of Recognition; Bribery Act 2010; UK GDPR and Data Protection Act 2018 (as amended by the Data (Use and Access) Act 2025); Equality Act 2010

Version history

Version	Date	Change
1.0	September 2013	First issue as Conflict of Interest Policy (QA-T89)
1.1	November 2014	Conflict of Interest in Assessment Policy and Procedure issued

Version	Date	Change
2.0	April 2026	Both policies revised
3.0	October 2026	Consolidated: organisational and assessment conflicts merged, register of interests, mitigation and AO notification, multi-AO alignment, BAC/QAA/OfS mapping, version control

1. Purpose

Learners, awarding organisations and the public must be able to trust that every decision UK Versity makes, and every assessment result it confirms, is impartial. This policy explains what a conflict of interest is, how staff declare interests, how the Quality Manager records and manages them, and what happens if a conflict is not declared.

The policy supports UK Versity's awarding organisations in meeting their obligations on conflicts of interest under the Ofqual General Conditions of Recognition, and forms part of UK Versity's risk management (BAC 1.6).

2. Scope

This policy applies to:

- directors and shareholders of UK Versity Online Limited, the Senior Management Team and Academic Board members;
- all staff, whether employed, part-time, freelance or contracted, including tutors, assessors, internal quality assurers (IQAs), invigilators and administrative staff;
- recruitment agents and associates acting on UK Versity's behalf.

It covers organisational decisions (admissions, fees, contracts, staffing, complaints, appeals, investigations) and all assessment, internal quality assurance, examination and certification activity for qualifications awarded by ATHE (Awarding body for Training and Higher Education), Pearson Education Ltd (Pearson BTEC, including BTEC Higher Nationals), OTHM Qualifications, Ascentis (including Access to HE Diplomas, validated under the QAA Access to HE scheme), NCFE (including qualifications under the NCFE CACHE brand, and NCFE Functional Skills) and Institute of Financial Accountants (IFA) qualifications delivered through IFA Direct, administered in partnership with ATHE.

For learners on Pearson BTEC Higher National programmes, the Pearson HN edition of this policy (v3.0, July 2026) applies and takes precedence where the two differ. The Pearson HN edition is the Conflict of Interest in Assessment Policy (Pearson HN).

3. Definitions

Conflict of interest: a situation in which a person has, or could reasonably be seen to have, a personal, family, financial or professional interest or loyalty that could influence, or appear to influence, a decision or judgement they make for UK Versity.

Actual conflict: the interest exists now and relates to a decision or assessment the person is involved in.

Potential conflict: the interest could create a conflict if circumstances change, for example if a relative enrolls.

Perceived conflict: a reasonable observer could believe the person's judgement is affected, even if it is not.

Connected person: a family member, partner, close friend, current or former colleague, a person the individual line-manages or employs, or a business associate.

Register of Interests: the central record of all declarations and the actions agreed, kept by the Quality Manager.

4. Policy statement and principles

1. Everyone within scope must declare any actual, potential or perceived conflict as soon as they become aware of it. If in doubt, declare.
2. Having an interest is not wrongdoing. Failing to declare it, or acting on it, is.
3. No person assesses, internally quality assures, invigilates or makes a decision about the work, admission, complaint, appeal or investigation of a connected person.
4. Where a conflict cannot be avoided, UK Versity puts in place safeguards that remove the person from the decision and add independent scrutiny.
5. No one within scope may give or accept preferential treatment, gifts, hospitality or inducements connected with admissions, assessment or certification. Any offer must be declared. Bribery is a criminal offence under the Bribery Act 2010.
6. UK Versity notifies awarding organisations of conflicts where they require it.

5. Examples of conflicts of interest

5.1 Assessment conflicts

- An assessor, IQA or invigilator is asked to assess, verify or supervise a family member, partner, friend, colleague or someone they manage.
- A member of staff is registered on a qualification delivered by UK Versity.
- A director or shareholder, who has a financial interest in learner achievement, acts as an assessor, IQA or Head of Centre making assessment decisions.
- A person who writes or customises assignment briefs, or who sees assessment materials in advance, also tutors learners on that qualification.
- A tutor provides paid private tuition to a UK Versity learner outside UK Versity.

5.2 Organisational and commercial conflicts

- A member of staff has a financial or other interest in a competing training provider, a supplier or an agent.
- A member of staff takes outside paid or voluntary work that competes with UK Versity or involves work for one of its awarding organisations, such as acting as an EQA.
- A member of staff is involved in recruiting, admitting or deciding fees or refunds for a connected person.
- A recruitment agent is related to, or has a financial arrangement with, an applicant beyond the agreed commission, or seeks to influence admission or assessment decisions.
- A member of staff investigates, or decides, a complaint, appeal or malpractice case involving a connected person or their own decision.

6. Declaration procedure

6.1 At appointment

Every new member of staff, assessor, IQA, invigilator, Academic Board member and agent completes a Conflict of Interest Declaration before starting work. The form must either list all interests or state "No conflict

to declare". The Tutor Coordinator (for tutors and assessors) or the Centre Coordinator (for agents and other staff) passes completed forms to the Quality Manager.

6.2 Annually

Every September, the Quality Manager asks all those within scope to confirm or update their declaration. Declarations must be returned before the start of the new academic year's assessment activity.

6.3 When circumstances change

Anyone within scope must declare a new or changed interest to the Quality Manager in writing within 2 working days of becoming aware of it, and in any case before taking part in the related decision or assessment. Examples include a relative applying to UK Versity, being allocated a learner they know personally, or taking on outside work.

6.4 At meetings and panels

Declarations of interest are a standing item at every Academic Board meeting, standardisation meeting, Appeals Panel and assessment board. A member who declares a conflict takes no part in the discussion or decision on that item, and this is minuted.

6.5 Register of Interests

The Quality Manager keeps the Register of Interests, recording for each declaration: the person, the interest, the date declared, the risk, the action agreed, who approved it and the review date. The register is confidential, stored under UKV-QA-29 Data Protection and Records Retention Policy, and made available to awarding organisations, EQAs and BAC inspectors on request.

7. Managing and mitigating conflicts

The Quality Manager assesses each declaration within 5 working days and agrees the action with the person. Conflicts involving the Quality Manager are assessed by the Principal and Director of Education. Conflicts involving the Principal are assessed by the Quality Manager and reported to the Academic Board.

Situation	Required action
Assessor or IQA is connected to a learner	A different assessor with no connection marks the learner's work. The work is IQA sampled at 100% by an IQA with no connection. The connected person has no access to the learner's assessment records.
Invigilator is connected to a candidate	A different invigilator supervises that candidate's assessment.
Member of staff studies a qualification at UK Versity	The member of staff is assessed by an assessor they do not line-manage and who does not line-manage them, with 100% IQA sampling by an IQA with no connection. The Quality Manager notifies the awarding organisation where it requires notification (ATHE must be told and must be given the arrangements). Where the awarding organisation requires, the staff member registers at another centre instead.
Director or shareholder acts as assessor, IQA or Head of Centre making assessment decisions	Declared on the register. Where avoidable, they do not make assessment or IQA decisions. Where they hold such a role, it is declared to the EQA at monitoring visits and, for ATHE, to ATHE, and additional IQA sampling is applied.
Staff member with access to assessment materials also tutors	Assessment materials are held securely on Moodle with restricted access; IQA checks that learner work shows no sign of advance knowledge.

Situation	Required action
Interest in a competitor, supplier or agent	The person takes no part in any decision about that organisation. The Principal decides whether the interest is compatible with their role.
Connected person applies for admission, fee concession or refund	The decision is made by another member of the Senior Management Team, applying the standard criteria in UKV-QA-05 or UKV-QA-08.
Agent has a conflict	The agent is not involved beyond referral; admission is decided by UK Versity staff under UKV-QA-05. The Centre Coordinator reviews the agent under UKV-QA-02.
Complaint, appeal or investigation involves a connected person or own decision	The person is replaced by an independent reviewer at that stage (see UKV-QA-20, UKV-QA-23 and UKV-QA-24).

Every action taken is recorded on the Register of Interests and reviewed at least annually, or when circumstances change.

8. Breach of this policy

1. A failure to declare a conflict, or acting on a conflict, is reported to the Quality Manager (or to the Principal where the Quality Manager is involved). Staff may use UKV-QA-28 Whistleblowing Policy.
2. The Quality Manager reviews any assessment, IQA or other decision affected by the undeclared conflict. Affected assessment decisions are re-marked by an independent assessor and IQA sampled at 100%.
3. Where the breach may have affected the integrity of an assessment or result, it is handled as suspected malpractice under UKV-QA-20, including notification to the awarding organisation.
4. A breach by a member of staff may lead to action under the staff disciplinary procedure. A breach by an agent may lead to termination of the agent agreement under UKV-QA-02.
5. Learners whose results are affected are informed and are not disadvantaged by the corrective action.

9. Roles and responsibilities

Role	Responsibility
Principal and Director of Education (Head of Centre)	Approves this policy; assesses conflicts involving the Quality Manager; decides on outside interests; makes sure AO notifications are made.
Quality Manager and Lead IQA	Owns this policy; keeps the Register of Interests; assesses declarations and agrees mitigation; runs the annual declaration exercise; arranges independent assessment and 100% IQA sampling; notifies awarding organisations where required.
Tutor Coordinator	Collects declarations from tutors and assessors at appointment; does not allocate learners to a conflicted assessor.
Centre Coordinator	Collects declarations from agents and other staff; manages agent conflicts under UKV-QA-02.
Examinations Officer and NCFE Coordinator	Obtains invigilator declarations before each examination session.
Academic Board	Records declarations as a standing item; receives the annual report on conflicts.

Role	Responsibility
All individuals within scope	Declare interests at appointment, annually and when circumstances change; withdraw from conflicted decisions.

10. Awarding organisation requirements

AO	Requirement / escalation route	Source document
ATHE	Centre must have a conflict of interest policy, checked at centre recognition and monitoring visits. ATHE must be told when centre staff study an ATHE qualification, with the assessment and IQA arrangements. Directors or shareholders should not normally make assessment or IQA decisions; where they hold such a role it must be declared to the EQA and to ATHE, and ATHE may apply additional measures such as increased sampling.	ATHE Conflict of Interest Policy (v3.5, September 2023)
Pearson	Conflicts are considered at assessment planning; no one assesses or verifies where a personal interest could compromise impartiality. BTEC Higher Nationals: Pearson HN edition, with declarations a standing item at every Assessment Board.	Pearson HN edition: Conflict of Interest in Assessment Policy (Pearson HN) v3.0
OTHM	Conflicts in assessment and IQA declared and managed by the centre; evidence available at EQA.	OTHM centre requirements, as reviewed at EQA
NCFE	Invigilators declare any conflict of interest at subject or learner level, and any outstanding malpractice sanction, before invigilating.	UKV-NCFE-FS-P-01 v1.0
Ascentis	Conflicts managed in line with the Centre Agreement.	Ascentis Centre Agreement (April 2026)
IFA Direct	ATHE requirements apply.	ATHE Conflict of Interest Policy (v3.5, September 2023)

11. Related policies and legislation

- UKV-QA-02 Public Information, Marketing and Agents Policy
- UKV-QA-05 Recruitment and Admission Policy
- UKV-QA-08 Fees, Payment, Cancellation and Refund Policy
- UKV-QA-15 Assessment Policy
- UKV-QA-16 Internal Quality Assurance Policy and Procedure
- UKV-QA-20 Malpractice and Maladministration Policy and Procedure
- UKV-QA-22 Examinations and Controlled Assessment Policy
- UKV-QA-23 Appeals Policy and Procedure
- UKV-QA-24 Complaints Policy and Procedure
- UKV-QA-27 Staff Recruitment, Induction and Development Policy
- UKV-QA-28 Whistleblowing Policy
- UKV-QA-29 Data Protection and Records Retention Policy

- Ofqual General Conditions of Recognition
- Bribery Act 2010
- UK GDPR and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025
- Equality Act 2010

12. Monitoring and review

The Quality Manager checks annually that every person within scope has a current declaration, audits the Register of Interests against assessor and IQA allocations, and confirms that 100% IQA sampling took place wherever it was required. The Quality Manager reports to the Academic Board at least annually on the number and types of declarations, the actions taken and any breaches.

This policy is reviewed annually by September, and earlier if awarding organisation requirements, BAC standards, an EQA action or a significant incident requires it. Declarations and the Register of Interests are kept for the duration of the person's engagement and at least 3 years after it ends; records relating to an assessment decision are kept for at least 3 years after certification, and records forming part of a malpractice investigation for at least 5 years.

Approval and review

Stage	Name and role	Date
Prepared by	Director of Education	30 September 2026
Checked by (policy owner)	Quality Manager	30 September 2026
Approved by	Ramanjeet Singh, Principal and Director of Education, on behalf of the Academic Board	1 October 2026
Next review due	Quality Manager (Shazia Khan) to schedule through the Policy Register UKV-QA-REG	September 2027