1st for Awarding Ltd
Conflict of Interest
& Whistleblowing Policy

1. Policy Purpose

The purpose of this policy is to set out the guidelines and procedures for identifying, recording, monitoring and managing actual, potential and perceived conflicts of interest relating to assessment activities.

This policy applies to all employees, contractors and associates working on behalf of 1st for Awarding Ltd and forms part of 1st for Awarding's arrangements to ensure that assessments remain valid, reliable, fair, comparable, manageable and impartial.

This policy also provides a mechanism for individuals to raise concerns regarding wrongdoing through the organisation's whistleblowing arrangements.

For the purposes of this policy, the term learner includes learners undertaking assessment through apprenticeship related or standalone assessment arrangements unless otherwise specified.

2. Definition

Whilst it is not possible to provide a definitive list of examples of conflict of interest, the overarching concept is that 1st for Awarding will not engage in any activity that could compromise the integrity, objectivity or impartiality of its assessment activities. A conflict of interest exists when an organisation or an individual has competing interests, relationships or obligations that could influence, or be perceived to influence decision-making.

Types of Conflict of Interest

Actual Conflict of Interest

Where a person's personal interests directly conflict with their professional responsibilities.

Potential Conflicts of Interest

Where circumstances exist that could give rise to a conflict of interest in the future.

Perceived Conflict of Interest

Where a reasonable person could conclude that a conflict of interest exists regardless of whether one does.

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Examples of actual, potential, or perceived conflicts of interest include:

- 1st for Awarding or its centre staff being involved in both the assessment and the on-programme delivery of a standard.
- Staff or contractors employed by 1st for Awarding having links with or being employed by the same organisation as the learner or the organisation undertaking the on-programme delivery.
- Family members studying at, employed by, or otherwise connected to the training provider, employer, or learner.
- Financial, commercial or consultancy relationships that may influence, or be perceived to influence assessment decisions.
- Staff or contractors undertaking assessment who have an existing or previous relationship with a learner, employer or training provider.

3. Scope

This policy applies to all key stakeholders engaged in assessment activities on behalf of 1st for Awarding and to any individual who may influence the outcome of an assessment. This includes:

- Employees
- Independent Assessors
- Internal Quality Assurers (IQAs)
- External Quality Assurers (EQAs)
- Invigilators
- Contractors and Consultants
- Governing Body members
- Individuals involved in the design, development, delivery, quality assurance, improvement or operational management of assessment activities.

4. Recognising Conflicts

Upon appointment, all 1st for Awarding employees and contractors must declare any known conflicts of interest, whether actual, potential or perceived.

1st for Awarding recognises that conflicts of interest may arise at any stage and therefore requires individuals to declare any conflict as soon as it becomes known.

An actual, potential or perceived conflict of interest may be declared by any stakeholder at any point within the assessment process.

Declarations raised by third parties will be considered appropriately and investigated where sufficient information is provided.

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5. Interests in Assessment

1st for Awarding acknowledges its responsibility to identify, minimise and, where possible eliminate conflicts of interest.

Where a conflict cannot be eliminated, appropriate action will be taken to manage and mitigate associated risks to ensure assessments remain valid, reliable, comparable, manageable and impartial.

Any assessor or invigilator with a conflict of interest relating to a learner, employer or training provider will not ordinarily be assigned to assess or invigilate these parties.

Where, having taken all reasonable steps, such involvement cannot be avoided, additional controls will be implemented. These may include independent review, additional quality assurance activity or arrangements for the relevant part of the assessment to be subject to scrutiny by another suitably qualified person.

Where conflicts of interest are identified, 1st for Awarding will seek to remove the conflict wherever possible. Where this is not possible, appropriate mitigation measures will be implemented and monitored.

1st for Awarding will ensure all identified conflicts are assessed, documented and managed proportionately to maintain the integrity of the assessment process and public confidence in its outcomes.

6. Managing Conflicts

In most cases, practical and proportionate measures will be sufficient to manage conflicts of interest effectively.

All declared actual, potential, and perceived conflicts of interest will be reviewed by the Head of Quality & Compliance and the Head of Delivery, who will determine:

1. Whether a conflict of interest exists.
2. The nature and potential impact of the conflict.
3. Appropriate mitigation measures.
4. Whether escalation to the Governing Body or other relevant authority is required.

The Head of Quality & Compliance retains overall responsibility for the oversight, recording and monitoring of conflicts of interest. The Head of Delivery will provide operational input where required, including consideration of assessment delivery arrangements and the implementation of appropriate mitigation measures. Where necessary, conflicts will be escalated in accordance with this policy.

All employees, contractors and associates are required to declare conflicts of interest:

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1. On recruitment, appointment or engagement
2. At least annually
3. As soon as they become aware of a new actual, potential or perceived conflict

All actual, potential or perceived conflicts of interest will be recorded in the internal Conflict of Interest Register, together with any agreed mitigation measures, actions, and review dates. The register will be monitored and reviewed regularly to ensure that identified conflicts continue to be appropriately managed and that mitigating controls remain effective.

Prior to assigning individuals to undertake assessment, quality assurance, invigilation or other assessment related activities, the Conflict of Interest Register will be checked to confirm that any identified conflicts have been appropriately managed. The register will be available for review by external quality assurers and regulatory bodies where required. Our assessment management system, Proficient, requires assessors and invigilators to declare any known conflict of interest prior to carrying out any work. This includes conflicts with the learner, employer or the training provider.

7. Responsibilities

It is the responsibility of all individuals involved in the assessment of learners and any associated quality assurance or awarding activities to:

- Conduct their activities in a manner that enables 1st for Awarding to maintain high standards of quality, integrity and compliance.
- Make their role and responsibilities clear and separate these from any other functions wherever possible.
- Monitor their activities to protect the reputation and integrity of 1st for Awarding.
- Devote sufficient time, care and professional judgement to their specific responsibilities;
- Recognise and promptly declare any actual, potential or perceived conflict of interest relating to themselves or others.

Managers are responsible for:

- Promoting awareness of this policy
- Ensuring staff understand their responsibilities
- Escalating declared conflicts in a timely manner

Failure to declare a known conflict of interest may constitute malpractice, in which case the Malpractice and Maladministration Policy will be followed.

The Head of Quality & Compliance is responsible for:

- Maintaining the Conflict of Interest Register
- Reviewing declarations
- Monitoring implementation of mitigating actions

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- Reporting significant risks to the Governing Body

The Responsible Officer retains oversight of significant conflict of interest and whistleblowing matters and will ensure that any issues requiring regulatory notification are escalated and reported in accordance with applicable regulatory requirements.

The Governing Body has oversight responsibility for ensuring the effectiveness of conflict of interest arrangements.

8. Reporting Conflicts

Conflicts of interest, whether actual, potential or perceived, can be reported at any time.

Employees and contractors should complete a Conflict of Interest Declaration Form.

Conflicts of Interest Declarations are issued via Adobe Sign at the start of employment or contractual arrangements and reviewed annually as a minimum. Any changes that arise between declarations must be reported immediately.

For all parties, conflicts can also be reported directly to the Quality Team by email: quality@1stforawarding.co.uk

For any queries regarding this policy please contact:
Email: quality@1stforawarding.co.uk
Telephone: 01642 205207 (Option 4)

9. Recording Procedure

All conflict of interest declarations will be recorded in the Conflict of Interest Register.

The register will include:

- Name of individual
- Nature of the conflict
- Date identified
- Assessment of risk
- Agreed mitigation measures
- Responsible person
- Review date
- Closure date (where applicable)

The register will be reviewed regularly by the Head of Quality & Compliance to ensure declared conflicts remain appropriately managed and that agreed mitigation measures remain effective. The register will be made available, where required, to external quality assurance representatives and regulatory bodies.

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Records will be retained and managed in accordance with 1st for Awarding's Data Retention and Data Protection arrangements.

10. Whistleblowing

10.1 What is a Whistleblower?

A whistleblower is a worker who reports certain types of wrongdoing, risk, malpractice or misconduct that they reasonably believe to be in the public interest.

The concern may relate to activities within the workplace, the delivery of qualifications or assessment services, regulatory compliance, quality assurance arrangements, financial practices, health and safety, safeguarding, or any other activity that has occurred, is occurring, or is likely to occur in the future.

Individuals who raise concerns reasonably believing that the information disclosed is in the public interest will be treated seriously and appropriately. No individual will suffer detriment, victimisation, discrimination or retaliation as a result of making a protected disclosure.

10.2 Complaints that may constitute whistleblowing

Protected disclosures may include concerns relating to:

- A criminal offence, such as fraud
- Risks to health and safety
- Attempts to conceal wrongdoing

10.3 Complaints that do not normally constitute whistleblowing

Personal grievances (for example bullying, harassment, discrimination) will not normally be treated as whistleblowing matters unless there is a wider public interest concern.

These concerns should be raised under the Complaints and Appeals Policy or relevant employment procedures.

Advice may also be sought from ACAS at: Advisory, Conciliation and Arbitration Service (ACAS).

10.4 Reporting Concerns as a Whistleblower

Whistleblowing concerns should normally be submitted in writing to:
quality@1stforawarding.co.uk

Where the concern relates to a member of the Quality Team or the Head of Quality & Compliance, the disclosure may be reported directly to the CEO or Chair of the Governing Body.

All concerns will be considered promptly, sensitively and appropriately.

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Where necessary, concerns will be investigated and escalated in accordance with 1st for Awarding's governance, quality assurance and regulatory requirements.

Where a whistleblowing disclosure indicates actual or potential malpractice, maladministration, a regulatory breach or an adverse effect, 1st for Awarding will investigate the matter and make any required regulatory notifications in accordance with applicable regulatory requirements.

10.5 Confidentiality

1st for Awarding will treat all disclosures and conflict declarations confidentially wherever possible.

Information will only be shared where necessary to investigate the concern, comply with legal obligations, protect individuals or meet regulatory requirements.

10.6 Protection from Retaliation

No individual shall suffer victimisation, discrimination, detriment or retaliation as a result of making a protected disclosure.

1st for Awarding will not tolerate any attempt to disadvantage an individual for making a protected disclosure and will take appropriate action where such behaviour is identified.

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V1.1	23rd Dec 2024	Updated – removed references to ACE360. Updated in line with General Conditions of Recognition
V2.0	1st October 2025	Brand, Terminology and links updated
V2.1	8th September 2026	Terminology updates, governance clarifications and minor drafting improvements

This document will be reviewed annually and updated as required

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