

# ASDAN Conflict of Interest Policy for Centres

Conflict of Interest is defined by the Regulators (General Conditions of Recognition), in relation to awarding organisations as existing 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 in 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.

As an Awarding Organisation ASDAN will take all reasonable steps to:

- identify and monitor:
  - a) all conflicts of interest which relate to it
  - b) any scenario in which it is reasonably foreseeable that any such conflicts of interest will arise in the future
- ensure that no conflict of interest which relates to it has an Adverse Effect (as defined in the General Conditions of Recognition), and where a conflict of interest has an Adverse Effect, take all reasonable steps to mitigate the Adverse Effect as far as possible and correct it
- ensure that, in relation to assessment, moderation and awarding:
  - a) no person who has a personal interest in the result will be involved
  - b) where, having taken reasonable steps, the involvement by such a person cannot be avoided, make arrangements for scrutiny by another person.

Centres must take all reasonable steps to support this policy in relation to Conflict of Interest, in order that Regulatory Conditions are met, and in order that there is no detrimental impact on standards of, or public confidence in, quality assurance and awarding.

In particular in relation to assessment and internal moderation it is important that, as part of the Centre Approval Process:

- all centres declare their awareness of the potential for conflict of interest, and take reasonable steps to ensure that the assessment of a learner is not undertaken by any person who has a personal interest in the result of the assessment (eg where student is family or friend of assessor)
- all centres are required to report such conflicts of interest in order that ASDAN can make arrangements for the relevant part of the assessment to be subject to scrutiny by another person.

Where there is a perceived conflict of interest, the following procedure will apply in order to avoid Adverse Effects:

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1. Centre will report perceived conflict of interest, at the earliest opportunity, to ASDAN
2. Identified conflict of interest is investigated by the Head of Qualifications and Quality, or designated QA Manager. This will vary according to the nature of the perceived conflict.
3. The individual(s) involved in the conflict will be contacted to provide further details, along with any independent “witnesses”, and an assessment is made of the situation, in particular any actions that need to be taken to mitigate the Adverse Effects that might occur
4. Where assessment or moderation has been carried out by someone who has a personal interest in the result, additional allocation of resources will be made to provide independent assessment and/or moderation, in order that Adverse Effects are mitigated.
5. A full record of the investigation and decisions will be made and kept, and a report provided to the centre
6. Where Adverse Effects are thought to have occurred, the Regulators will be informed at the earliest opportunity.