Conflict of Interest Policy

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Notes	Please also refer to the HBXL Complaints, Appeals & Whistleblowing Policy and HBXL Maladministration and Malpractice Policy.

1. Aims and Scope

HBXL Building Software trusts in the professionalism of the staff it employs operating the brand HBXL Skills Academy. This Conflict of Interest policy is intended to mitigate risks and safeguard learner achievements as well as staff and HBXL Skills Academy's integrity and reputation. It also contributes to the maintenance of awarding body accreditation and certification where this is relevant.

The most important feature of the policy is the instruction that staff and relevant individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest.

This policy applies to staff and other individuals who interact or potentially interact with the assessment-related work of the training activities of HBXL Skills Academy. This includes individuals involved with all aspects of devising, setting, marking, administering, internally verifying or any other activity connected with the assessment of learners and associated supporting resources and services.

The individuals falling within the scope of this policy include full-time, part-time, prorate and support staff of HBXL Skills Academy and any associate staff such as subcontractors. The content of the policy cannot cover every potential conflict and must be interpreted in the light of the particular circumstances of each conflict.

2. Definition and Examples of Conflict of Interest

A conflict of interest occurs where the professional responsibilities and position of trust held by an individual or an organisation is compromised by the potential for personal gain or organisational benefit from a situation. E.g. If a member of staff is related to a learner whose work they assess, there is a conflict of interest as they have a personal interest in their relative's achievement.

Activities related to managing a conflict of interest:

- Staff are trained in managing boundaries and related conflicts as part of their induction.
- Where there is potential for a conflict of interest, the Skills Academy Lead and any accrediting body (where relevant) will be notified, and their agreement requested prior to the start of the course.
- Any agreed conflict of interest will be recorded on a central log maintained by the Skills & Quality Assurance Manager.
- Learners are introduced to key policies during their induction and new policies or procedures are introduced during modules delivery.

Circumstances where a conflict of interest disclosure should be made:

It is important that staff and learners recognise and disclose any situations that present a conflict of interest for example:

- staff applying to study or currently studying where they are an employee:
- teaching, assessing, internally verifying an assessment where a relative, friend or colleague is a learner.
- learners completing an assessment that is supervised or assessed by a member of staff who is a relative, carer or family friend.

3. Roles and Responsibilities

- All relevant staff have a responsibility to be aware of the potential for a conflict of interest. It is possible that staff working in any assessment related role might encounter potential conflicts of interest from time to time. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on standards of, or public confidence in the HBXL Skills Academy educational provision. Staff can find themselves in potential conflicts of interest situations because they are not clear what the correct, auditable processes and procedures are.
- The Conflict of Interest policy is a requirement of the induction of all new tutors, and assessment related support staff and staff asked annually of any potential conflicts of interest (as and when the situation arises, tutors and support staff must notify the school of any learners that are at the HBXL Skills Academy who are family members, other relatives or close friends). The Skills & Quality Assurance Manager oversees the induction of all new staff.
- Any day-to-day concerns identified by an individual should be raised with their line manager in the first instance. This will be the member of staff who is performance managing them.
- Any concerns that the individual feels are urgent should be communicated immediately to the Skills & Quality Assurance Manager or Skills Academy Lead and may be done so in confidence. It is an individual's responsibility to raise concerns relating the conflict of interest directly with the Skills & Quality Assurance Manager.

4. Failure to disclose a conflict of interest

If a conflict of interest is identified that has not been disclosed, the related assessment will be invalidated and the staff or learner disciplinary procedure will be activated. The accrediting body will be notified of the conflict of interest.

5. Managing a Conflict of Interest

The Skills & Quality Assurance Manager will take steps to manage the conflict e.g.

- provide an alternative assessor, internal verifier, or support worker who is not related to any learner.
- inform the accrediting body (where relevant) if the tutor is the only available specialist in that subject area to seek their permission.
- arrange for any additional scrutiny to monitor fair and impartial approaches. For example additional assessment moderation with the Skills & Quality Assurance Manager or other member of staff
- record the conflict of interest in the Conflict of Interest log maintained by the Skills & Quality Assurance Manager.
- provide details of conflicts of interest to visiting External Quality Assurers where relevant and appropriate or others associated with the accrediting body.

If a learner or staff member believes that a declaration of conflict of interest has not been managed correctly, they may raise a complaint in line with the Complaints, Appeals & Whistleblowing Policy.

6. Review and Monitoring

The Conflict of Interest Policy will be reviewed bi-annually and at other times in the intervening period as necessary.