



Reference Number: AQ_01-a07

Conflict of Interest Policy

Revision History

Version	Last revised	Next review date	Policy Owner	Notes
AQ_01	17 February 2012	31 March 2013	James Stephenson	Policy created
AQ_01-a01	19 April 2013	31 March 2014	James Stephenson	Reviewed and revised
AQ_01-a02	15 August 2013	31 March 2014	James Stephenson	Reviewed and terminology updated
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AQ_01-a06	4 January 2016	30 June 2016	Claire Garth	Updated
AQ_01_a07	14 March 2016	30 June 2017	Quality Assurance Manager	Reviewed

1. Definition

A conflict of interest (COI) is defined as a situation where a person is charged with taking responsibility or making a decision, and where that person or a person with a close relationship to them might benefit unfairly from that position of responsibility or from that decision.

Common situations where a COI is likely to occur within the sphere of NCC Education's activities are:

- the registration of candidates to Centres
- the assessment of candidates
- internal corporate, procurement and human resource decisions.

1.1. Persons who may be affected by a COI

The following persons are required to read and abide by this policy:

- all employees of NCC Education
- all contracted examiners and moderators
- all those attending an NCC Education Assessment Board, regardless of whether they are in attendance as a member of the Board or an observer
- all attending NCC Education's Academic Board
- all teaching, support and senior management staff employed by Centres.

1.2. Circumstances in which a COI must be declared

A conflict of interest should be declared in the circumstances below; if in doubt, always declare it.

Type A: When...

- you
- your spouse
- your child
- another relative
- a close friend
- a person to whom you have obligations, whether personal, financial, and so on (examples might include employers or someone to whom you are in debt)

...are registered on, or taking a course leading to, an NCC Education qualification with which you have involvement, whether through teaching, administering or assessing.

Type B: When a person from the list above [Type A] or a company which they represent is under consideration for an NCC Education contract or position at a Centre, and you have influence over the making of that decision. Examples would include procurement of goods or services from external providers, appointment of teaching staff and so on.

2. Procedures for the Declaration of Interests

If any person should declare their interests in line with the definitions stated above, they must normally do so in writing or by email to the Quality Assurance Manager (see contact details in Section 5 below).

The exception to this is for those attending meetings of an NCC Education Assessment Board or the Academic Board; in this case, the Chair will invite those present to declare interests at the beginning of each meeting. When a meeting is in session and the Chair or Secretary are aware of interests which are not declared, either by someone present or someone absent, then the Chair or Secretary is obliged to declare those interests to the meeting.

Employees of NCC Education who fail to declare interests may be subject to disciplinary action. Employees of Centres who fail to declare interests will be considered to have committed malpractice as outlined in NCC Education's *Malpractice and Maladministration Policy*, and as such the employee or Centre may be sanctioned.

If you are unsure what to declare, whether to declare, or how to declare, please contact NCC Education's Quality Assurance Manager for confidential guidance.

2.1. Data Protection

Any information provided when declaring an interest will be treated in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that relevant persons act in the best interests of NCC Education, its Centres, and candidates. The information provided will not be used for any other purpose.

3. Recusal

When a conflict of interest has been declared, the relevant person will be expected to withdraw from any conversations or activities which may be affected by the conflict. This is known as 'recusing yourself'. Any person attending a meeting who has declared a conflict of interest but fails to recuse themselves may be asked to leave by the Chair. Any person involved in the admission or assessment of candidates who has declared a conflict of interest but fails to recuse themselves from activities relating to that candidate may be subject to disciplinary action. If such a person is employed by a Centre, the Centre will be expected to follow disciplinary proceedings. If the Centre fails to do so, they may be subject to disaccreditation.

4. What you must do if you are subject to a conflict of interest

Act now to inform NCC Education's Quality Assurance Manager, and be sure to recuse yourself from any activities which may be questioned in regard to the person or organisation from whom your conflict of interest arises.

If you are honest and transparent about conflicts of interest and have regard for how your actions might be perceived by others in the future, then no problems will arise.

5. Contact details

Conflicts of interest may be reported in the following ways:

By email: quality@nccedu.com

By post: For the attention of the Quality Assurance Manager
NCC Education
The Towers
Towers Business Park
Wilmslow Road
Didsbury
Manchester M20 2EZ
UK

By phone: +44 (0)161 438 6200

By fax: +44 (0)161 438 6240

Opening hours: Monday to Friday 8.30-17.00 (GMT/BST)