

ISP Conflict of Interest Policy

Definition

In this context a conflict of interest is defined as:

“A conflict between private or commercial interests and the official responsibilities of a person in a position of trust”

Circumstances in Which Conflicts May Arise

Conflicts of interest may occur in a variety of situations, including but not limited to where:

- An individual has a financial interest in an activity, outcome or decision of ISP.
- An individual holds a position or appointment in a company or organisation that may benefit from an ISP outcome.
- An individual has a commercial interest in, or works for, a competitor organisation delivering the same or similar qualifications or apprenticeship assessments.
- An ISP associate, independent assessor, external quality assurer or committee member works for, consults for, or has close links with an Approved Training Organisation (ATO), employer or Assessment Organisation involved in the same qualification or apprenticeship assessment.
- An assessor, internal quality assurer or apprenticeship assessor assesses a learner with whom they have a personal relationship (e.g. family member or close associate).
- An individual has access to confidential ISP materials (e.g. assessment materials, mark schemes, question banks) while having an interest in a training provider or other organisation that could benefit from that access.
- ISP develops or markets products or services linked to qualification delivery or apprenticeship assessment, creating a potential commercial conflict.
- An organisation is responsible for developing assessment materials and for administering or marking those assessments, without appropriate separation of duties and controls.

This list is not exhaustive. Any situation that may compromise, or be perceived to compromise, impartiality must be treated as a potential conflict of interest.

Policy Statement and Principles

ISP is committed to identifying, preventing and managing actual, potential and perceived conflicts of interest through a transparent and robust governance framework.

Conflicts of interest are managed through:

- Clear separation of roles and responsibilities
- An interlocking committee structure designed to provide independent oversight and balanced representation
- Standing conflict of interest declarations at all relevant meetings
- Contractual obligations placed upon staff, committee members, Approved Training Organisations (ATOs), employers and Assessment Organisations
- Operational checks and controls embedded within quality assurance and risk management processes

This framework ensures that decision-making is transparent, objective and free from undue influence.

ISP adopts a proactive approach to conflict management, requiring early identification, formal declaration and timely mitigation of any actual, potential or perceived conflict.

This policy underpins ISP's commitment to impartiality, integrity and public confidence in its qualifications and apprenticeship assessments.

Declaration of Interests

All members of the ISP Senior Management Team, Board of Directors, the external Governance & Assurance Quality Board and all permanent, part time or temporary staff and Apprenticeship Assessors/Associates will make a Statement of Declaration of their interests in any other relevant organisation, and also any receipt of gifts or hospitality above a nominal value, in connection with their role in ISP.

The statement is to be updated at least, annually or when significant changes occur. A record of the statements will be held by the Quality Manager and will be accessible to the Senior Management Team, Governing Body members, senior staff and external regulatory authorities if required.

Responsibilities and safeguards: It is the responsibility of each person involved with ISP and the Quality Manager to identify potential conflicts of interest. Once identified, these potential conflicts will be added to their statement and safeguards (for both sides) will be agreed as to what is an acceptable outcome. In essence, if there is a conflict of interest, the person who is in conflict should withdraw from any activities, discussions or decision making that may be affected by the conflict of interest.

4) Data protection

All information provided under this policy will be processed and retained in accordance with the principles set out in the Data Protection Act 1998 and the Freedom of Information Act (Scotland). Data will be used only to ensure that all persons act in the

best interest of ISP, and in accordance with Regulatory Requirements. The information will not be used for any other purpose.

If a potential conflict of interest is not declared but is known to any member of the SMT, Governing Body or QAG, then the person to whom it is known must inform the Quality Manager or Governing Body who must speak to the individual concerned to seek clarification and where appropriate obtain a Statement of Declaration or take other appropriate action.

Minimising, Preventing and Managing Conflicts of Interest

i. Purpose

ISP Awarding Organisation is committed to ensuring that all qualifications and apprenticeship assessments are developed, delivered and quality assured in a manner that is fair, valid, reliable and impartial.

ii. External Oversight and Quality Assurance

ISP delivers its qualifications and apprenticeship assessments through recognised Approved Training Organisations (ATOs), employers and, where applicable, Assessment Organisations.

ISP operates a robust external quality assurance system to ensure that all parties:

- Identify, declare and appropriately manage actual, potential or perceived conflicts of interest.
- Maintain clear separation between training, assessment and quality assurance functions.
- Operate in accordance with regulatory requirements and ISP policies.

This includes potential conflicts between learners, assessors, apprenticeship assessors, internal quality assurers, ATO staff, employer representatives and any other individual involved in the assessment process.

iii. Identification and Management of Conflicts

Within ISP, conflicts of interest must be declared to the Quality Manager as soon as they are identified.

Conflicts of interest are a standing agenda item at:

- Senior Management Team (SMT) meetings
- Governance & Quality Board (GAQ) meetings
- Apprenticeship assessment meetings

All identified conflicts are recorded within the ISP Risk Management Process and documented in the ISP Complaints and Issues Log.

The Complaints and Issues Log is reviewed regularly by SMT and the Governance & Quality Board to ensure effective oversight, mitigation and resolution of identified risks.

ISP Responsibilities

i. Organisational Commitments

ISP is committed to ensuring that:

- All learners receive a consistent, fair and high-quality qualification and apprenticeship assessment experience.
- ATOs and employers retain responsibility for selecting appropriate teaching and learning materials and for setting their own fees, which may include ISP qualification or apprenticeship assessment fees.
- ATOs are allocated impartial External Quality Assurer (EQA) or Apprenticeship Assessors.
- ATOs have access to clear and transparent appeals and complaints procedures.
- Open, transparent and timely communication is encouraged to prevent and resolve conflicts of interest.

Although not exhaustive, these principles support ISP's commitment to impartiality, transparency and fairness, thereby protecting the integrity of the organisation and its qualifications and apprenticeship assessments.

ii. Responsibilities of Individuals

All individuals involved in the development, delivery, assessment or quality assurance of ISP qualifications and apprenticeship assessments must:

- Act in a manner that upholds the aims, integrity and reputation of ISP.
- Clearly separate their ISP responsibilities from any other professional, commercial or personal interests.
- Exercise appropriate professional judgement and devote sufficient time to fulfil their duties competently.
- Identify, declare and report any actual, potential or perceived conflict of interest promptly.
- Cooperate fully with ISP processes designed to manage and mitigate conflicts.

Action to resolve a potential Conflict of Interest

Following a declaration of a potential conflict of interest, the Quality Manager with the unaffected members of the Governing Body or Senior Management Team will meet and undertake a risk assessment of the conflict of interest.

The following points will be recorded:

- The nature and extent of the conflict of interest.
- The actions that will be taken to manage/mitigate the conflict of interest
- Any required safeguards for the protection of both sides involved in the conflict

Conflict of Interest Declaration Form

Section 1: Personal Details	
Full Name:	
Role within ISP:	
Date:	
Section 2: Financial and Commercial Interests	
1. Financial Interest	
Do you have any financial interest in an activity, organisation or arrangement outside ISP that could benefit from, or be influenced by, a decision or outcome of ISP?	
☐ Yes ☐ No	
If Yes , please provide details:	
2. Company Appointments	
Do you hold any directorship, partnership, trusteeship or other formal appointment in an organisation that may gain from a decision or activity of ISP?	
☐ Yes ☐ No	
If Yes , please provide details:	
3. Commercial Interest in Competitors	
Do you have any commercial interest in, or working relationship with, a competitor organisation that delivers the same or similar qualifications or apprenticeship assessments as ISP?	
☐ Yes ☐ No	
If Yes , please provide details:	
4. Gifts and Hospitality	
Have you received any gifts or hospitality in connection with your role at ISP with a value exceeding £50 (the ISP nominal value threshold)?	

☐ Yes

☐ No

If **Yes**, please provide details (including approximate value and provider):

5. Interests in Training Providers, Employers or Learners

Do you have any personal, financial or professional interest in:

- An Approved Training Organisation (ATO)
- An employer involved in ISP qualifications or apprenticeship assessments
- An ISP learner
- Or access to confidential ISP assessment materials (e.g. exam papers, mark schemes) that could create a conflict

☐ Yes

☐ No

If **Yes**, please provide details:

Section 3: Declaration

I declare that:

- The information provided in this form is accurate and complete to the best of my knowledge.
- I understand my obligation to declare any actual, potential or perceived conflict of interest as soon as it arises.
- I agree to update this declaration promptly if my circumstances change.
- I understand that failure to disclose relevant information may result in appropriate action being taken.

Signature:

Print Name:

Date: