


Policy/procedure	Conflict of Interest Policy
Senior Manager Responsible	Gary Wiswell 
Author	Gary Wiswell
Approved by	SMT
Date approved	17/12/24
Next review date	17/12/25
Changes made 8/11/23	Align the policy explicitly with Ofqual General Conditions of Recognition (2024). Introduce formal processes for declaring, recording, and managing conflicts using a Conflict of Interest Register. Add preventative measures for recruitment to avoid conflicts in hiring processes. Expand the scope to include external stakeholders, contractors, and associates. Require annual conflict of interest training and declarations for staff and associates. Enhance the policy review process with annual reporting to Senior Management.

Statement

This policy adheres to the requirements outlined in **Ofqual General Conditions of Recognition, Section A4 (Conflicts of Interest)** and associated guidance. FLM Training Limited will review these requirements annually to ensure compliance.

FLM will ensure that any assessment of learners (including internal quality assurance sampling) is not undertaken by any person who has a potential interest in the result of the assessment. All staff must declare prior to any assessment if they have any links with candidates and must remove themselves from that process when possible.

Where an assessment by such a person cannot be avoided, arrangements should be made for the relevant part of the assessment to be subject to scrutiny of another person such as any Internal Verifier.

Should FLM staff wish to gain any qualification an independent assessor and/or internal quality assurer will be used to conduct the assessment process. If this is not possible, FLM will contact the awarding body and request External Quality Assurer to be present during the assessment process to ensure objective and reliable assessment decisions are made.

Any FLM Training Limited employee, contractor, or associate must declare potential or actual conflicts of interest in writing to their line manager or the designated quality manager. All declarations will be recorded in the **Conflict of Interest Register**, maintained by the Quality Manager.

The register will include details of:

- The nature of the conflict

- Actions taken to mitigate the conflict
- Review outcomes of any mitigation measures.

Responsibility

The responsibility for the administration of this policy lies with the Directors.

Scope

This policy applies to all employees, contractors, associates, and any external stakeholders engaged in FLM Training Limited's qualification delivery, assessment, or quality assurance processes.

Conflict Prevention in Recruitment

To prevent potential conflicts of interest during recruitment, FLM Training Limited will:

- Ensure that recruitment panels are free from personal or financial conflicts of interest.
- Require panel members to declare any connections to applicants prior to interviews.
- Use independent oversight for senior or sensitive appointments.

Training and Annual Declarations

All staff, contractors, and associates will be required to undertake annual training on conflict of interest policies and procedures. Additionally, an **annual declaration form** must be completed to confirm any existing or potential conflicts of interest.

Policy Review

The Conflict of Interest Policy will be reviewed annually by the Quality Manager. A summary of conflicts identified and mitigations undertaken will be presented to the Senior Management Team to ensure continuous improvement and compliance.