



# Conflict of Interest Policy

## Introduction

This document outlines conflict of interest policy for White Star Medical Services Ltd covering:

- broad approach to identifying and monitoring all actual/potential conflicts of interest, both now and in the foreseeable future; and
- the possible conflicts of interest that have been identified and arrangements put in place to prevent these from occurring.
- the declaring and managing conflicts of interest.
- Declaration of conformance.

This and supporting documents may be requested by AoFA Qualifications (AoFAQ) to satisfy them of our ability to comply with their requirements in relation to conflicts of interest and to prevent such conflicts becoming 'Adverse Effects' (as defined by AoFAQ).

## Review Arrangements

We'll review this document annually as part of our self-evaluation arrangements. However, a review will be commissioned earlier should an issue arise in relation to an actual or potential conflict of interest and/or in response to customer, learner or regulatory feedback.

## Definition of a Conflict of Interest

For the purposes of this policy we have adopted the definition used by AoFAQ in relation to conflict of interest. In essence a conflict of interest exists in relation to White Star Medical Services Ltd where:

- its interest in any activity undertaken by it, on its behalf, or by a member of its staff have the potential to lead it to act contrary to its interest in the delivery of qualifications in accordance with the requirements of the regulator's Conditions of Recognition,
- a person who is connected to the delivery of qualifications at White Star Medical Services Ltd has interest in any other activity which have the potential to lead that person to act contrary to his or her interests in that delivery and impact on our compliance with the requirements of AoFAQ,
- an informed and reasonable observer would conclude that either of these situations was the case.

## Interests in presenting and assessment

White Star Medical Services Ltd will take all reasonable steps to avoid any part of the assessment of a Learner (including by way of moderation) being undertaken by any person who has a personal interest in the result of the assessment. Trainers, Moderators and Markers should be considered if their actions could affect the validity of the qualification or assessment outcome.

If a person who does have a conflict of interest with the assessment of a learner, White Star Medical Services Ltd will take reasonable steps to ensure the relevant part of the assessment is subject to scrutiny by another person.



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## Examples of potential Conflict of Interest:

Where the Trainer, Assessor, Marker or Moderator:

- is employed by the Learner
- is a close family relationship / close friend with the Learner
- has a business relationship with the Learner
- where the Learner is a Manager / Supervisor of the said person
- Financial gain either direct or indirect is involved

## Conflict of Interest Principles

In implementing our approach to identifying and managing actual/potential conflicts of interest staff are required to abide by the following principles:

- All managers and staff must buy into and commit to identifying and managing all actual/potential conflicts of interest that may affect White Star Medical Services Ltd and in doing so raise possible conflicts of interest with the Head of Centre if in doubt.
- Staff must be proactive in the identification and management of conflicts of interest that may affect our effectiveness, level of regulatory compliance and/or reputation.
- Staff must be open about the nature of any potential/actual conflicts of interest and not try to hide or present them in a better light – managing conflicts of interest is about preventing issues from occurring that may impact on our operational effectiveness and/or regulatory compliance.
- Strive to identify and deal with conflicts of interest sooner rather than later.
- Our controls to managing any potential conflicts of interest must be proportionate to the risks associated with the identified conflict(s).

If the breach is also classified as an Adverse Effect then the Head of Centre shall promptly inform AoFAQ stating the reasonable steps that we have taken or intend to take to prevent, correct or mitigate the Adverse Effect. Including a details of any reviews we are/will carry out. AoFAQ will also offer advice where applicable.

For information, the Ofqual definition of an Adverse Effect is:

*An act, omission, event, incident, or circumstance has an Adverse Effect if it –*

- a) gives rise to prejudice to Learners or potential Learners, or*
- b) adversely affects –*
  - i. the ability of the awarding organisation to undertake the development, delivery or award of qualifications in accordance with its Conditions of Recognition,*
  - ii. the standards of qualifications which the awarding organisation makes available or proposes to make available, or*
  - iii. public confidence in qualifications.*



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## Declaring a Conflict of Interest

- White Star Medical Services Ltd will take all reasonable steps to ensure that a Conflict of Interest does not occur, if this is not possible:
  - A declaration of actual or potential conflicts of interest must be notified to the Head of Centre as soon as possible.
  - Where an actual conflict of interest has occurred White Star Medical Services Ltd will notify AoFAQ.
- White Star Medical Services Ltd will keep a log of all actual or potential conflicts of interest.

## Declaration

I have read and understood the contents of the White Star Medical Services Ltd Conflicts of Interest policy and agree to abide by this policy.

Name	Signature	Role (Assessor / Trainer etc.)	Date