

Conflicts of Interest:

A Short Guide for GA Centres

This Short Guide is intended to support centres in understanding what COI is, how to identify a COI, and what action must be taken to address the COI.

1. What is a Conflict of Interest ('COI')?

A conflict of interest occurs when an individual's personal interests – family, friendships, financial, or social factors – could compromise their judgment, decisions, or actions in their professional work life.

Conflicts of interest are very common and are not automatically considered a sign of wrong-doing.

All approved GA centres MUST understand their responsibilities under the *GA Conflicts of Interest policy*, available on the GA website.

2. Why is COI important to consider?

We need to be able to identify, declare and manage conflicts to ensure they do not compromise the performance and reputation of your centre, GA and the qualifications being delivered, as well as the wider reputation of regulated qualifications.

COI can be:

- **Perceived** – a perceived COI is one where someone else, usually outside the Centre or GA, might reasonably conclude that a conflict exists.
- **Potential** – a potential COI is one where a COI might easily arise in the future.
- **Actual** – an actual COI is one where there is a clear conflict between a person's duties or responsibilities.

If COI is not properly managed, this can undermine confidence in your professional standing. Even where the centre or member of staff might benefit from an arrangement, such as recruiting a family member because they are 'known', managing the actual and perceived COI that arises from the situation can create a lot of extra work!

3. Examples of COI

The following are some examples of where a COI might occur:

- The head of centre employs an unqualified relative or friend
- A member of centre staff owns their own business which competes with the centre's business
- Centre staff accept gifts or hospitality from a student
- A centre incentivises staff by offering a bonus for the number of learners achieving a 'pass'
- A centre offers learners a 'Guaranteed Pass' or a money-back guarantee, which could compromise the integrity of the assessment

- The centre's IQA is tasked with moderating assessment decisions made by another staff member with whom they have a personal relationship
- The Centre trains and assesses a staff member, particularly where that staff member is being trained to deliver or IQA the same qualification for that Centre.
- Where an individual performs multiple roles, for example being responsible for quality assurance and also responsible for meeting operational targets

4. As a Centre, what do I need to do?

First, you must ensure that all of your staff are fully aware of what a conflict of interest is and set up arrangements to allow them to report any perceived, potential or actual conflicts of interest to the appropriate person – usually the Head of Centre.

If you are the head of centre, you need to work with your staff to identify, declare and manage any conflicts that arise, whether for you or your staff.

- **Identify:** be confident that you and your staff can identify conflicts of interest when they arise.
- **Declare:** tell GA about the conflict using the *Declarations of Interest Form* (available on the GA website). The form sets out specific instructions for completing and submitting the form.
- **Manage:** agree with GA and, where appropriate, the members of staff or students affected on steps that you need to take to manage the conflict.

Managing the COI may mean restricting your involvement or removing yourself from a decision-making, recruitment or procurement process. It may, for example, require you to make alternative arrangements for managing a particular staff member or specific area of work. If it is in relation to a staff member undertaking a qualification with the centre, it could entail GA providing a new assessment paper and/or observing or even delivering the assessment to the staff member.

5. Where can I find more information and support?

You can find full details of GA's arrangements for COI in the GA Conflicts of Interest Policy, available on the GA website.

Alternatively, you can contact your dedicated GA contact for help and support with any queries or questions relating to COI.