

HiQual UK

CONFLICTS OF INTEREST POLICY

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Policy Owner	Dr. James Whitmore, Head of Quality Assurance and Compliance
Approved By	Sarah Mitchell, Chair of the Academic and Standards Committee
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1. Policy Statement

HiQual UK is committed to maintaining the highest standards of integrity, impartiality, independence and transparency in the development, delivery, assessment, quality assurance and certification of its qualifications.

HiQual UK recognises that actual, potential and perceived conflicts of interest may arise in connection with its activities. Such conflicts must be identified, declared, assessed and appropriately managed to ensure that they do not compromise, or appear to compromise, academic standards, assessment decisions, quality assurance processes, certification decisions, centre relationships or the interests of learners.

This policy establishes the principles, responsibilities and procedures through which HiQual UK identifies, manages, monitors and records conflicts of interest.

2. Purpose

- Define conflicts of interest within the context of HiQual UK activities.
- Establish clear requirements for the declaration of interests.
- Ensure actual, potential and perceived conflicts are appropriately managed.
- Protect the integrity and impartiality of assessment and quality assurance.
- Safeguard learners and the credibility of HiQual UK qualifications.
- Establish clear responsibilities for personnel, committees, centres and external associates.
- Maintain appropriate records and an auditable decision trail.
- Provide appropriate escalation arrangements for significant conflicts.

- Support consistent and transparent governance across HiQual UK.

3. Scope

- Governing Board members and committee members
- Senior management and employees
- Consultants and contractors
- Qualification developers and subject specialists
- Assessors, examiners and moderators
- Internal and External Quality Assurance personnel
- Centre approval and centre monitoring personnel
- Certification, appeals, complaints and investigation personnel
- Approved centre owners, managers, tutors and trainers
- Learners where a relevant conflict exists
- Suppliers, external service providers, advisers and partners

4. Definition of Conflict of Interest

A conflict of interest exists where an individual's personal, professional, financial, commercial, academic or other interests could improperly influence, or could reasonably be perceived to influence, the objective performance of their responsibilities or a decision they are required to make.

4.1 Actual Conflict

An actual conflict exists where a conflict between an individual's responsibilities and another interest currently exists.

4.2 Potential Conflict

A potential conflict exists where circumstances could develop into an actual conflict in the future.

4.3 Perceived Conflict

A perceived conflict exists where a reasonable and informed person could believe that an individual's impartiality or independence may be compromised, even where no actual improper influence has occurred.

5. Core Principles

5.1 Integrity

Individuals must act honestly and uphold the integrity of HiQual UK qualifications and activities.

5.2 Impartiality

Decisions must be based on objective evidence, published requirements, established procedures and appropriate professional judgement.

5.3 Independence

Individuals must not participate in decisions where their interests or relationships could compromise their independence.

5.4 Transparency

Relevant interests must be declared openly and promptly.

5.5 Proportionality

Management arrangements must be proportionate to the nature and level of risk.

5.6 Accountability

Individuals are responsible for identifying and declaring relevant conflicts and complying with agreed mitigation measures.

5.7 Learner Protection

Conflicts must be managed in a manner that protects learners from unfair assessment, certification or progression decisions.

6. Examples of Conflicts of Interest

6.1 Assessment

- Assessor is related to the learner.
- Assessor has a close personal relationship with the learner.
- Assessor has a financial interest in the learner's success.
- Assessor has provided substantial private tuition to the learner.
- Another relationship may affect objective assessment.

6.2 Internal Quality Assurance

- IQA personnel have assessed work they are required to quality assure.
- They have a personal relationship with an assessor or learner.
- They have a financial interest in the outcome.
- Another interest could affect independent judgement.

6.3 External Quality Assurance

- EQA personnel are employed by the centre being reviewed.
- They previously worked for the centre.
- They have a financial interest in the centre.
- They have a close relationship with centre personnel.
- Another relationship may affect independence.

6.4 Centre Approval

- The individual owns or manages the applicant centre.
- The individual is employed by the applicant centre.
- The individual has a financial relationship with the centre.
- The individual has a close personal or family relationship with centre management.

6.5 Qualification Development

- The developer has a commercial interest in a competing qualification.
- The developer owns or operates a training organisation intending to deliver the qualification.
- The developer could benefit financially from a particular qualification decision.
- The developer has a significant relationship with a proposed delivery partner.

6.6 Certification

- Personnel involved in certification have a relationship with a learner, centre or other party that could influence certification decisions.

6.7 Complaints and Appeals

- Individuals must not normally investigate or determine a complaint or appeal where they were directly involved in the original decision or otherwise have an interest in the outcome.

7. Declaration Requirements

- All individuals covered by this policy must declare any actual, potential or perceived conflict of interest as soon as they become aware of it.
- Declarations must be made promptly and must not be delayed until an annual declaration exercise.
- Where an individual is uncertain whether an interest constitutes a conflict, the interest should be declared so that HiQual UK can determine the appropriate course of action.
- Failure to declare a relevant conflict may constitute a breach of this policy and may result in further investigation.

8. Annual Declaration of Interests

- HiQual UK may require relevant personnel to complete an annual Conflict of Interest Declaration.
- Annual declarations may include external employment, directorships, business ownership, financial interests, consultancy arrangements, professional relationships, relationships with approved centres, relationships with learners, external academic or professional responsibilities, and other relevant interests.
- An annual declaration does not replace the requirement to declare a new conflict when it arises.

9. Conflict Assessment

- Following a declaration, the designated HiQual UK authority will assess the conflict.
- The assessment should consider the nature of the interest, parties involved, activity affected, likelihood of inappropriate influence, potential impact on learners, qualification integrity, reputational risk, available mitigation and whether the individual should withdraw.
- The assessment and resulting decision should be documented.

10. Management Measures

- Withdrawal from the relevant decision
- Reallocation of responsibilities
- Appointment of an independent assessor
- Appointment of an alternative Internal or External Quality Assurer
- Independent moderation
- Additional sampling or review
- Restriction of access to confidential information
- Removal from a committee or meeting
- Additional centre monitoring
- Independent procurement review

- Temporary or permanent removal from the relevant activity

11. Conflicts Involving Approved Centres

- Approved centres must maintain effective arrangements for identifying and managing conflicts of interest within their own activities.
- Centres must ensure assessment personnel declare relevant conflicts, Internal Quality Assurance personnel maintain appropriate independence, conflicts involving learners are properly managed, appropriate records are maintained, and significant conflicts affecting HiQual UK activities are reported to HiQual UK.
- HiQual UK may require additional controls where centre arrangements are considered inadequate.

12. Gifts and Hospitality

- Individuals must not accept gifts, hospitality, commissions or other benefits where these could influence, or reasonably appear to influence, professional judgement.
- Any significant gift, hospitality or benefit that could create a conflict must be declared in accordance with HiQual UK procedures.

13. Financial and Commercial Interests

- Individuals must declare financial or commercial interests that could reasonably influence their HiQual UK responsibilities.
- Such interests may include business ownership, directorships, consultancy arrangements, commission arrangements, supplier relationships, financial interests in centres, and financial interests in competing education or training organisations.
- Where appropriate, the individual must withdraw from the relevant activity.

14. Personal and Family Relationships

- A relevant relationship must be declared where a close family member, partner, close friend or other person with whom an individual has a significant personal relationship is a HiQual UK learner, works for or owns an approved centre, is involved in assessment or quality assurance, is a supplier, is involved in a complaint or appeal, or may materially benefit from a HiQual UK decision.
- A relationship does not automatically constitute misconduct. The key requirement is appropriate disclosure and management.

15. Conflict of Interest Register

- HiQual UK will maintain a Conflict of Interest Register for significant declared conflicts.
- The register may record the date of declaration, name and role, nature of the conflict, activity affected, risk assessment, mitigation measures, responsible decision-maker, review date, and resolution or closure date.
- Access to the register will be restricted to authorised personnel.

16. Confidentiality and Data Protection

- Information relating to conflicts of interest must be handled confidentially.
- Information will only be shared with individuals who require access for legitimate governance, quality assurance, compliance, investigation or decision-making purposes.
- Personal information associated with conflict declarations will be managed in accordance with applicable data protection requirements and HiQual UK's relevant privacy and data protection arrangements.

17. Failure to Declare a Conflict

- Where an individual fails to disclose a relevant conflict, HiQual UK may take proportionate action.
- Possible action includes formal warning, removal from the relevant activity, independent review, additional quality assurance, reassessment of affected work, review of certification decisions, investigation under the Malpractice and Maladministration Policy, corrective action, suspension of responsibilities, contractual or disciplinary action, and centre sanctions where applicable.
- The response will consider the seriousness of the omission, its impact and whether the failure was deliberate or inadvertent.

18. Conflicts Identified After a Decision

- If a conflict is identified after an assessment, certification, centre approval, quality assurance decision or other significant decision, HiQual UK will determine whether the conflict could have affected the validity or integrity of the decision.
- Where necessary, HiQual UK may conduct an independent review, reallocate the relevant activity, conduct additional moderation, review assessment evidence, review certification decisions, conduct additional centre monitoring, implement corrective action, or notify relevant stakeholders where appropriate.

19. Governance Responsibilities

19.1 Governing Board

The Governing Board is responsible for ensuring that appropriate arrangements exist for the identification and management of conflicts of interest.

19.2 Academic and Standards Committee

The Academic and Standards Committee provides appropriate oversight of conflicts that may affect academic standards, qualification integrity, assessment or quality assurance.

19.3 Head of Quality Assurance and Compliance

The Head of Quality Assurance and Compliance is responsible for maintaining this policy, advising personnel, reviewing significant declarations, maintaining records, monitoring mitigation arrangements, escalating material conflicts and reporting significant risks to appropriate governance bodies.

19.4 Managers and Committee Chairs

Managers and committee chairs must ensure that relevant interests are declared before individuals participate in decisions where a conflict may exist.

19.5 Employees and Associates

All employees, contractors, consultants, assessors, quality assurance personnel and other associates must understand this policy, declare relevant conflicts, follow agreed management arrangements, maintain impartiality and report emerging conflicts promptly.

19.6 Approved Centres

Approved centres are responsible for implementing appropriate local arrangements and complying with HiQual UK's requirements concerning conflicts of interest.

20. Escalation

- A conflict must be escalated where it presents a significant risk to qualification integrity, may affect multiple learners, affects assessment or certification decisions, involves senior governance personnel, cannot be adequately managed through normal controls, involves suspected malpractice or maladministration, or creates a significant reputational or operational risk.
- Significant matters may be referred to the Governing Board or relevant academic and quality governance committee.

21. Record Retention

- HiQual UK will maintain appropriate records relating to declared conflicts, including declarations, assessments, mitigation decisions, reviews and outcomes.
- Records will be retained in accordance with HiQual UK's document retention requirements and applicable legal, contractual and regulatory obligations.

22. Monitoring and Review

- HiQual UK will periodically review the effectiveness of its conflict of interest arrangements.
- Monitoring may include review of declarations, the Conflict of Interest Register, mitigation measures, centre arrangements, internal and external quality assurance findings, complaints and appeals, malpractice and maladministration investigations, and governance reviews.
- This policy will be formally reviewed at least annually or sooner where significant changes occur.

23. Related Policies

- Academic Governance Policy
- Quality Assurance Policy
- Qualification Approval Policy
- Assessment Policy
- Certification Policy
- Centre Recognition Policy
- Centre Monitoring Policy
- Malpractice and Maladministration Policy
- Appeals Policy
- Complaints Policy
- Reasonable Adjustments Policy
- Data Protection and Privacy Policy

- Whistleblowing Policy

24. Policy Review and Approval

This policy shall be reviewed at least annually and may be reviewed earlier where required by changes in legislation, regulatory expectations, organisational arrangements, qualification requirements, quality assurance findings or identified risks.

Any substantive amendment to this policy must be approved through the appropriate HiQual UK governance arrangements.

25. Version Control and Amendment History

Version	Date	Summary of Changes	Author / Owner	Approval
1.0	20 July 2026	Initial issue of the HiQual UK Conflicts of Interest Policy.	Dr. James Whitmore, Head of Quality Assurance and Compliance	Governing Board
1.1	Reserved	Future amendment	Policy Owner	Governing Board
2.0	Reserved	Future major revision	Policy Owner	Governing Board

26. Approval Record

Approval Role	Name / Position	Approval Date
Policy Owner	Dr. James Whitmore, Head of Quality Assurance and Compliance	20 July 2026
Committee Approval	Sarah Mitchell, Chair of the Academic and Standards Committee	20 July 2026
Final Approval	Governing Board, HiQual UK	20 July 2026