



Conflict of interest policy

AIM Associates

Who is this policy for

All staff (including assessment associates and contractors) need to be aware of the potential for a conflict of interest. This policy is designed to provide information on conflicts of interest, why these need to be managed and how they will be managed. It provides information on the responsibilities staff have to report conflicts of interest.

Owner	Compliance Director
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Conflict of interest – Associates policy

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Contents

Section 1 - Scope	4
1.1 Scope	4
1.2 About us	4
Section 2 – Policy detail	5
2.1 Definitions	5
2.2 Responsibilities.....	5
2.3 Disclosure of conflicts of interest:.....	6
Section 3 – Regulatory references.....	8
3.1 Conditions and licencing criteria	8
Appendix 1 - Useful contacts.....	9

Section 1 - Scope

1.1 Scope

This Conflicts of Interest Policy with related Procedures applies to AIM Qualifications and Assessment Group associates and provision delivered either within or outside the UK.

The purpose of this Conflicts of Interest Policy is to provide guidelines and procedures to ensure that External Quality Assurers, Moderators, Markers, Qualification developers and reviewers maintain impartiality and objectivity in their examination processes. It is essential to prevent any actual or perceived conflicts of interest that may compromise the integrity and fairness of any assessment or examination of AIM Qualifications and Assessment Group qualifications.

This policy and related procedures are intended for:

- All individuals serving as associates for AIM Qualifications and Assessment Group. Associates include both internal staff members and external subject matter experts appointed to assess candidates' performance in external assessment or qualifications.
- AIM Qualifications and Assessment Group Associates include External Quality Assurers, Moderators, Markers, Qualification developers and reviewers.

1.2 About us

AIM Qualifications and Assessment Group is a leading **Awarding Organisation** and one of the UK's largest **Access Validating Agencies (AVA)**. We work in partnership with colleges, independent training providers, universities, employers, and voluntary organisations to develop accredited and regulated vocational qualifications. Our qualifications cover a range of academic levels from Entry Level to Level 6 across a wide range of subject areas. As an AVA we are licensed by the Quality Assurance Agency (QAA) to develop and award nationally recognised Access to Higher Education Diplomas. AIM Qualifications and Assessment Group is also an independent, government recognised, **End-Point Assessment Organisation (EPAO)** responsible for an apprentice's final assessment to ensure they can do the job for which they've trained.

Section 2 – Policy detail

2.1 Definitions

Associate An individual assigned by AIM Qualifications and Assessment Group to evaluate candidates' performance in qualifications assessed internally or externally.

Conflict of Interest A situation in which an associates personal, professional, financial, or other interests could unduly influence their impartiality or objectivity during the assessment process.

2.2 Responsibilities

The following represent the key responsibilities of AIM Qualifications and Assessment Group and Associates.

2.2.1 AIM Qualifications and Assessment Group responsibilities

Overseen by the Compliance Director, AIM Qualifications and Assessment Group will:

- Assess and manage whether a Conflict of Interest may occur during organisational structure changes.
- Review all Conflicts of Interests yearly to ensure they logged, managed, and resolved effectively.
- Ensure that contracts for associates clearly outline the expectations relating to them managing conflicts of interest arising from other activities that they undertake.
- Ensure that any associate who has access to confidential assessment material for a qualification or assessment does not deliver/attend training events for those associated qualifications and assessments.
- Publish guidance to all associates on potential conflicts of interest.
- Ensure all cases of potential or actual Conflicts of interest are reported within the organisation appropriately and where necessary to the appropriate regulatory body.

2.2.2 AIM Qualifications and Assessment Group Associate responsibilities

All Associates representing AIM Qualifications and Assessment Group must:

- Report all potential or actual Conflicts of Interests to ensure they logged, managed, and resolved effectively by AIM Qualifications and Assessment Group.
- Ensure that the expectations of the contract relating to managing conflicts of interest arising from other activities are understood
- Reads and understands guidance to published on potential conflicts of interest.

2.3 Disclosure of conflicts of interest:

Prior to accepting the role of an associate, individuals must disclose any potential conflicts of interest to the Compliance team. This includes any affiliations, financial interests, or personal relationships that may affect their ability to conduct an unbiased evaluation.

Actual, potential or perceived conflicts of interest could arise from any of the following the list is not exhaustive:

- previous or current employment at an AIM centre or any other education organisation
- employment at a training provider that contracts AIM for end point assessment services or qualifications
- appointment to a board, committee, tribunal panel etc of AIM or an AIM centre
- membership of a professional body with an interest in the development, delivery or award of qualifications or apprenticeships
- contractual or personal relationship with AIM or their staff, eg consultants
- contractual or personal relationship with an employee whose employer is an AIM centre or contracts AIM for end point assessment services or qualifications
- personal or professional relationship with a candidate who is undertaking an AIM qualification or end point assessment
- Individual is a governor for an AIM Qualifications and Assessment Group approved school, college, or training provider.

The individual may consider that they do not have a conflict of interest however they need to consider whether the activity could be seen as a perceived conflict of interest. A perceived Conflict of Interest is a situation where an outside observer could perceive that an awarding organisation or individual has a competing interest or loyalty.

All associates are required to complete a conflicts of interest declaration form, providing comprehensive information regarding any potential conflicts, whether they are direct or indirect, financial, or non-financial in nature.

All markers for external assessment will be required to confirm any conflicts of interest prior to each external assessment series and where appropriate allocations will be reviewed.

The conflict of interest will be thoroughly reviewed, and the disclosures made by any associates. If any actual or perceived conflicts of interest are identified, appropriate steps will be taken to mitigate their impact on the assessment or qualification development/review processes and one of the outcomes agreed:

- **Approved** – the associate is approved to complete the work allocated by AIM Qualifications and Assessment Group.
- **Referred** – further information is required to demonstrate suitability

- **Declined** – the conflict of interest is unable to be managed appropriately by AIM Qualifications and Assessment Group.
- **Restricted** – where a significant conflict of interest exists, the associate may be restricted from working with specific centres or qualifications.

If a conflict of interest is declared after the work has been completed by an Associate, the Compliance team will agree the appropriate course of action to ensure that all affected learners work or qualifications are subject to additional levels of scrutiny and where appropriate, reported to the associated regulatory body.

Failure to disclose conflicts of interest or violations of this policy may result in disciplinary actions, which can include removal of allocations or other appropriate measures.

2.3.1 Confidentiality:

All conflicts of interest disclosures submitted by associates will be treated with the utmost confidentiality. Only authorised personnel directly involved in the assessment or qualification development/review process will have access to this information.

Associates are expected to maintain confidentiality about their involvement in the assessment or qualification development/review process to avoid potential biases or perceptions of bias.

2.3.2 Impartiality and objectivity:

Associates must approach their role with complete impartiality and objectivity. They must not favour any candidate, qualification or show bias based on personal beliefs, affiliations, or other factors.

Associates must adhere to the established assessment guidelines provided by AIM Qualifications and Assessment Group.

2.3.3 Recusal

If an associate becomes aware of a conflict of interest after being assigned to an assessment or qualification development/review, they must immediately notify AIM Qualifications and Assessment Group and recuse themselves from the process.

In such cases, a replacement associate will be appointed, ensuring an unbiased evaluation of candidates and qualifications.

2.3.4 Training and awareness

AIM Qualifications and Assessment Group will provide training and resources to examiners to enhance their understanding of conflicts of interest and the importance of impartiality in the assessment and qualification development/review process.

Section 3 – Regulatory references

3.1 Conditions and licencing criteria

This policy is intended to meet the regulatory requirements of Ofqual, Qualifications Wales, CCEA and QAA. In particular:

Section	Condition/Licensing criteria
Conflicts of interest	Condition A4
Identification and management of risk	Condition A6
Malpractice and maladministration	Condition A8
Cooperation with regulators	Condition B6
Arrangements with centres	Condition C2
Maintaining confidentiality of assessment materials	Condition G4
Appeals process	Condition I1
Compliance with regulator’s appeals and complaints process	Condition I2
Conflicts of interest	Condition A4
Identification and management of risk	Condition A6
<p>No one who has developed a diploma or who: has an immediate or potential conflict of interest in a diploma to be involved with validations, monitoring or whether conditions for approval have been met.</p> <p>Involved in the development of a diploma, or: who has an immediate or potential conflict of interest in the decision about a proposed diploma, is involved in the process of validation of that diploma or in monitoring and confirming whether conditions for approval have been met</p>	Licensing Criteria 68
Agreements between the moderator and the ava	Licensing Criteria 105
Moderators are external and not directly involved in admissions decisions for learners progressing from a diploma course they are moderating	Licensing Criteria 107

Section 4 - Appendices and links

Appendix 1 - Useful contacts

Link 1 - [AIM website](#)

Appendix 1 - Useful contacts

The following provides contact details for AIM Qualifications and Assessment Group and its regulators.

AIM Qualifications and Assessment Group Contact details

If you have any queries about the contents of the policy, please contact our **Compliance Director**

Telephone: [0333 034 8833](tel:03330348833)

Email: enquiries@aimgroup.org.uk

Regulators' contact details

CCEA

Telephone: [02890 261 200](tel:02890261200)

Email: info@ccea.org.uk

Ofqual

Telephone: [0300 303 3344](tel:03003033344)

Email: public.enquiries@ofqual.gov.uk

Qualifications Wales

Telephone: [0333 077 2701](tel:03330772701)

Email: enquiries@qualificationswales.org

The Quality Assurance Agency for Higher Education (QAA)

Telephone: [01452 557 000](tel:01452557000)

Email: enquiries@qaa.ac.uk