



Who is this policy for

This policy is for centres and its staff, AIM Qualifications and Assessment Group staff or other personnel in relation to conflicts of interest which may arise in relation to AIM Qualifications and Assessment Group activities and approved qualifications or units delivered either within or outside the UK

Owner

Director of Awarding and Regulations

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Version control

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Section 1 – Scope

1.1 Scope

This Conflicts of interest applies to AIM Qualifications and Assessment Group approved provision.

This policy is intended for:

- centres and its staff delivering AIM Qualifications and Assessment Group approved qualifications or units
- AIM Qualifications and Assessment Group staff, associates and trustees to ensure that conflicts of interest are identified and managed in a consistent and fair manner

The purpose of this policy is to:

- define conflicts of interest and adverse effects
- identify examples which could lead to actual or perceived conflicts of interest
- detail the responsibilities AIM Qualifications and Assessment Group, centres and centre staff have
- detail follow-up actions after actual or perceived conflicts of interest have been identified
- provide the regulatory references which apply
- provide useful contacts of both AIM Qualifications and Assessment Group and the various regulators

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, **Apprenticeship Assessment Organisation** responsible for an apprentice's assessment to ensure they can do the job for which they've trained.

1.3 Responsibilities

The following represent the key responsibilities of AIM Qualifications and Assessment Group, centres, centre staff and learners.

1.3.1 AIM responsibilities.

Overseen by the Responsible Officer, AIM will:

- ensure that all AIM Qualifications and Assessment Group employees, people acting on the behalf of AIM Qualifications and Assessment Group and approved centres are fully aware of this policy
- ensure that all AIM Qualifications and Assessment Group's employees and approved centres understand what constitutes an actual or potential conflict of interest
- ensure that all AIM Qualifications and Assessment Group' employees and people acting on the behalf of AIM Qualifications and Assessment Group staff sign a declaration of interest prior to commencing work with AIM Qualifications and Assessment Group and on an ongoing annual basis
- ensure that all approved centres are fully aware of their responsibility to declare and appropriately mitigate any conflict of interest that may arise.
- commit to identifying all actual or potential conflicts of interest that may affect AIM Qualifications and Assessment Group
- ensure that conflicts of interest are requested and declared at the start of each AIM Qualifications and Assessment Group organisational meeting
- be open and transparent about the nature of any identified actual or potential conflict of interest
- manage all actual or potential conflicts of interest in a consistent and timely manner in accordance with this policy
- ensure that the controls for managing any potential conflict of interest is proportionate to the risks associated with the identified conflict
- ensure that all declared conflicts of interest are recorded, clearly stating how these conflicts have been appropriately mitigated
- continuously monitor existing and potential conflicts of interest
- maintain current internal and external conflict of interest registers, updating details and removing items as appropriate
- provide advice and guidance to approved centres on how to mitigate conflicts of interest
- take the necessary action to ensure the integrity of the assessment process is maintained when conflicts of interest cannot be avoided
- take the necessary action to ensure the integrity of the assessment process is maintained when conflicts of interest cannot be avoided
- take all reasonable steps to prevent any adverse effects from occurring due to an actual or potential conflict of interest
- inform the appropriate regulatory authorities where an adverse effect may occur and the steps which will or have been taken to prevent, correct or mitigate the adverse effect
- inform another awarding organisation where that organisation may be affected by an actual or potential conflict of interest
- make all conflict of interest registers available to the qualifications regulators for scrutiny as requested
- ensure that in the case of a conflict of Interest being identified during external quality assurance activity another member of the AIM Qualifications and Assessment Group team is to verify the learner's achievement
- ensure all contracts of employment for all members of staff require staff to maintain confidentiality whilst in and after employment

- ensure all staff involved in the creation, assessment and moderation of externally assessed qualifications must follow the following instructions:
 1. You must maintain complete security and confidentiality of material at all times
 2. The requirement extends to a period of two years following termination
- Any information or material that assessment writers/reviewers/examiners/markers have access to as a result of work carried out on behalf of AIM Qualifications and Assessment Group at an external organisation, must be kept confidential at all times, for an indefinite period.
- ensure any training delivered about confidential assessments will only utilise examination papers, questions and/or material that are not, or will be, used for any live examination. Training to centres about confidential assessments will not be delivered by any person involved with the development of those assessments.

1.3.2 Centre responsibilities

All centres delivering AIM Qualifications and Assessment Group qualifications must:

- have a policy in place for dealing with conflicts of interest
- ensure that all staff involved in the management, assessment and quality assurance of AIM Qualifications and Assessment Group qualifications are fully aware of this and the centre's own policy, and the possible implications of failing to declare any actual or potential conflict of interest
- ensure that all centre staff understand what constitutes an actual or potential conflict of interest
- have appropriate mechanisms in place to identify any actual or potential conflict of interest and mitigate these
- take all reasonable steps to ensure that no conflict of interest results in an adverse effect
- promptly report all actual or potential conflicts of interest to AIM Qualifications and Assessment Group, even if this is resolved, via the conflict of interest form on our website and return to compliance@aimgroup.org.uk
- record all declared conflicts of interest, clearly stating how these conflicts have been appropriately mitigated via the conflict of interest form on our website and return to compliance@aimgroup.org.uk
- continuously monitor existing and potential conflicts of interest
- inform AIM Qualifications and Assessment Group where there is a change in circumstances to any previously reported actual or potential conflict of interest, by e-mailing compliance@aimgroup.org.uk
- maintain a conflict of interest register, updating details and removing items as appropriate
- take all reasonable steps to avoid any part of the assessment and verification of a learner's work being undertaken by any person who has a personal interest in the result of the assessment
- ensure that independent scrutiny takes place if a conflict of interest cannot be avoided when delivering an AIM Qualifications and Assessment Group's qualification or unit
- carry out actions assigned by AIM Qualifications and Assessment Group relating to conflicts of interest
- notify AIM Qualifications and Assessment Group if any personnel involved, in the conflict of interest, leave the centre, by e-mailing compliance@aimgroup.org.uk

Section 2: Policy Detail

2.1 Definition

Conflict of Interest is

A conflict of interest is a situation in which an individual or organisation has, or is perceived to have, competing interests or loyalties which could lead to a potentially subjective, biased or corrupt decision being made by that individual or organisation, contrary to the interests of AIM Qualifications and Assessment Group.

Ofqual, Qualifications Wales and CCEA states that a conflict of interest exists in relation to AIM Qualifications and Assessment Group where:

- AIM Qualifications and Assessment Group' interests in any activity undertaken, on its behalf, or by a member of AIM Qualifications and Assessment Group, have the potential to lead to act in any way contrary to its interests in complying with its conditions of recognition
- a person who is connected to the provision of AIM Qualifications and Assessment Group' qualifications has interests in any other activity which have the potential to lead that person to act in any way contrary to his or her interests in that provision by AIM Qualifications and Assessment Group in compliance with its conditions of recognition
- an informed and reasonable observer would conclude that either of these situations was the case

QAA states that a conflict of interest exists in relation to AIM Qualifications and Assessment Group where

the external interests of an individual connected with AIM Qualifications and Assessment Group are such as to interfere with, **or perceived as having an effect on:**

- the independent exercise of the person's judgment and making or participating in the making of decisions on behalf of AIM Qualifications and Assessment Group
- fulfilling their obligations to AIM Qualifications and Assessment Group

2.1.1 Conflict of interest examples

The items listed below are examples of situations that may lead to actual or perceived conflicts of interest. These are not exhaustive and are only intended as indicative guidance.

- When an individual has a position of authority in one organisation which conflicts with their interests in another organisation
- When an individual has personal interests that conflict with their professional position
- When an individual works for, or carries out work on behalf of AIM Qualifications and Assessment Group, but who may have paid or unpaid personal interests in another organisation which uses or produces similar products or services of AIM Qualifications and Assessment Group
- When an individual works for or carries out work on the behalf of AIM Qualifications and Assessment Group who has friends or relatives taking the assessments or examinations of AIM Qualifications and Assessment Group
- Personal interests in, connections to, or family relationships with learners who are taking an AIM Qualifications and Assessment Group qualification
- Situations where commitment, loyalty or integrity is compromised
- Where there is a conflict between income and regulatory responsibilities
- Direct or indirect financial gain and/or benefits
- Reciprocal arrangements that compromise the ability to make reliable and professional judgements
- When one part of AIM Qualifications and Assessment Group creates and follows a procedure that conflicts with its regulatory responsibilities as an awarding organisation

2.2 Process

Centres are required to notify AIM Qualifications and Assessment Group if a Conflict of Interest is identified. The centre must complete a Conflict of Interest form which can be found on the secure customer resources area of the website. The form requires centres to explain what the conflict of interest is and how any associated risks will be mitigated. Once completed, the form must be sent to compliance@aimgroup.org.uk

The form will be reviewed by a member of the AIM Awarding and Regulations team and a decision communicated to the centre within 5 working days of receipt. The centre and/or centre staff may be required to comply with specific actions in order to mitigate the risks of the Conflict of Interest.

2.2.1 Management of conflict of interests

AIM Qualifications and Assessment Group will respond to notifications of conflict of interests arising after the allocation of work to associates by:

- removing the individual immediately from the centre(s) and access to Quartz
- informing the centre immediately of the removal of the individual so that the centre can remove any access rights that the individual may have to their internal systems
- allocating at first available opportunity a replacement for the centre
- informing the centre of the newly allocated associate
- ascertaining the circumstances surrounding the conflict of interest and initiating an investigation where the late/non-declaration of conflict of interest has occurred
- terminating any offer of work where any breaches of the conflicts of interest policy and procedure have occurred

AIM Qualifications and Assessment Group will respond to reported conflict of interest at centres by:

- ascertaining the circumstances surrounding the conflict of interest
- reviewing any actions the centre has already taken
- confirming if any further actions are required and if so, identify date for completion
- initiating an investigation if the notification was not received by the centre or was deemed to be late
- reporting and actioning any late or non-declared conflicts of interest to the regulator and recording on Quartz against the relevant centre. All documentation will be kept for three years
- recording any received notifications which do not require further action on Quartz against the relevant centre. All documentation will be kept for three years.

Centres will respond to a conflict of interest identified between staff and candidate at the start of, or during an assessment/examination by:

- replacing the assessor/invigilator with another suitable member of staff
- **if this is not possible**, you must move the candidate to another assessment/ examination room

- **if this is not possible**, you must add an additional member of staff to invigilate/assess those candidates

2.2.2 AIM Commitment to Managing Conflicts

We will

- Assess whether a conflict of interest may occur during any team restructures or changes to job roles. Where a conflict could occur, we will take reasonable steps to avoid the conflict from arising or to manage the conflict if it cannot be avoided.
- Review our policy relating to conflict of interest regularly to make sure it is clear how conflicts of interest or potential conflicts of interest should be logged, managed, and resolved.
- Check that the contracts with our Assessment Associates are clear and set out the obligations on them to manage conflicts of interest arising from other activities that they undertake.
- Ensure that anyone with access to confidential assessment material for a qualification or Apprenticeship does not deliver the training or attend training events about that product.
- All AIM staff, including assessors of Apprenticeship assessments, must declare any friends or family members who are scheduled to take an upcoming AIM assessment. In addition, any conflicts of interest related to assessments must be declared. These conflicts could include, for example, close relationships with individuals inside or outside of AIM (such as a partner being the Head of Centre at an approved centre), or any involvement with other organisations that could lead to a conflict, such as serving as a governor of a school that offers AIM qualifications.
- Review our organisational level conflicts of interest each year to ensure they continue to be managed appropriately.
- Ensure that there is independence between on-programme training and apprenticeship assessment for the same group of apprentices for the same standard (even where there is a separation of training and assessment).

2.2.3 Who is responsible for Managing Conflicts of interest at AIM

Line Managers

- Line Managers in each department are responsible for communicating this policy to all relevant individuals within their areas of responsibility
- Line Managers are responsible for checking that all new staff are made aware of the conflict of interest policy as part of their induction period and understand how to raise potential conflicts of interest.
- Line Managers are responsible for discussing identified conflicts of interest with the relevant member of staff and either resolving the issue or, for issues that cannot be resolved, reporting the issue to their Director.

Directors

- All directors must ensure any potential or actual conflict of interest is considered and logged, as required

- Both the individual and their Line Manager are responsible for thoroughly documenting the issue before deciding on the appropriate course of action. The Line Manager must ensure that records of the discussion are securely maintained and logged on the employee file on Sage

All AIM Staff

- Everyone is responsible for making sure that they are familiar with this policy
- Individuals are required to report any activity that may create an actual or potential conflict of interest. If there is uncertainty about whether a conflict exists, the issue should be brought to the attention of their Line Manager for discussion and clarification.
- Any AIM Qualifications and Assessment Group staff member considering paid or unpaid work outside of AIM Qualifications and Assessment Group should notify their Line Manager if they believe there is a potential for a conflict of interest. If the staff member is uncertain whether a conflict might arise, they should discuss the matter with their Line Manager, who will maintain a record of the conversation. Staff members must not engage in activities that could be seen as competing with or conflicting with AIM's operations. Staff must not engage in activities until approval has been granted by their Line Manager.
- Before each examination series, all staff, non-executive members of the Board, and members of the AIM Board must declare if any candidates being entered for our exams or assessments are family members, relatives, or friends. This should be done by completing a declaration of interest form. A reminder will be sent out annually, but such declarations are required for every exam series where a conflict arises. It is the responsibility of each staff member to ensure they submit the necessary declarations for each exam series, as appropriate.

Responsible Officer

- The Responsible Officer is tasked with escalating reports of actual or potential conflicts of interest to the appropriate level within the organisation, and, when necessary, to the Board and relevant regulatory authorities.

2.2.4 Logging and Managing conflicts of interest

- Organisational level conflicts of interest will be reviewed each year as part of the Annual Statement of Compliance activity. A central log of identified conflicts is maintained by HR department
- Conflicts of interest related to assessments, involving staff or employees, are recorded in a central log managed by the Qualification and Assessment Team
- Once the appropriate declaration form is submitted, the information will be reviewed, and a further discussion will be held if necessary. If the conflict cannot be effectively managed, the staff member will be notified, and the issue will be discussed in more detail with their Line Manager.
- If a conflict of interest can be managed, a management plan will be established and reviewed according to a mutually agreed timeline. All ongoing conflicts will be evaluated at least once a year.

2.3 Communication of the decision

AIM Qualifications and Assessment Group will communicate to:

- the centre where any actions are required
- the appropriate regulatory authorities, where an adverse effect may occur
- other awarding organisations, where that organisation may be affected by an actual or potential conflict of interest

All received declarations of conflict of interest will be recorded. Declarations are acknowledged within 2 working days by the External Compliance team and we will agree one of the following possible outcomes within 5 working days of receipt:

- **Approved:** Centre has evidenced that the conflict can be effectively managed, the staff member is approved to assess/internally verify/invigilate/manage the examination
- **Referred:** AIM requires further information from the centre in order to make an informed decision and implement any required mitigation
- **Approved with actions:** Further appropriate steps agreed to have the invigilation or assessment scrutinised by another person
- **Declined:** The conflict of interest cannot be effectively managed, and the application has been declined

If a declaration has been made after the examination or assessment has taken place, this will be reviewed in line with AIM Malpractice and Maladministration policy

2.4 Appeals against the decision or action

If an applicant is dissatisfied with the decision, they can appeal to AIM Qualifications and Assessment Group within 10 working days of receiving the outcome by following the process described in the [AIM Enquiries and appeals policy](#)

2.4.1 Learner Complaints

If any learner is unhappy with how a centre has dealt with conflict of interest and has exhausted the centre's own complaints and appeals procedures, they must follow the [AIM Compliments, complaints and whistleblowing policy](#) to submit a complaint.

Section 3: Regulatory References

3.1 Conditions and Principles

This policy is intended to meet our regulatory requirements. In particular:

Section	Condition/Principle /Access to HE Condition
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
An awarding organisation must act with honesty and integrity	Principle 1
An awarding organisation must treat Learners fairly by acting and taking decisions with due impartiality and based on appropriate evidence	Principle 2
An awarding organisation must act in a way that maintains and, where possible, promotes public confidence in qualifications	Principle 4
An awarding organisation must act in an open, transparent and co-operative manner with Ofqual and, as appropriate, with Users of qualifications	Principle 5
An awarding organization must conduct its activities with a proactive approach to compliance with its conditions of recognition	Principle 6
Agreements between the moderator and the AVA	Access to HE Condition E4.3
Moderators are external and not directly involved in admissions decisions for learners progressing from a diploma course they are moderating	Access to HE Condition E4.3

Section 4: Appendix

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 us.

Telephone: 0333 034 8833

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.uk

The Quality Assurance Agency for Higher Education (QAA)

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

Email: enquiries@qaa.ac.uk

Disclaimer: Please note that any downloaded version of our policies may not be the most current iteration. For the latest updates and accurate information, kindly refer to the version available on our official website.