

CONFLICTS OF INTEREST POLICY

Issue Number	Effective Date	Amendments	Reason for Amendments
7	30 May 2025	Regulatory references table. Updates to scenarios and examples. Addition of form and guidance for reporting potential adverse effects. Update to guidance on review of potential and conflict of interest process.	To outline IMI and regulatory requirements conditions with links. To give greater clarity for IMI staff on their areas of responsibility To give greater clarity for IMI staff on their areas of responsibility. To give greater clarity for IMI staff on their areas of responsibility and the process.

Purpose and Scope

The purpose of this policy is to ensure the successful management of conflicts of interest, or potential conflicts of interest, which may arise specifically from the IMI's activities. This policy is designed to uphold the highest standards of integrity and trust, both within the organisation and in its interactions with stakeholders.

Conflicts of interest, whether real or perceived, have the potential to undermine the credibility of the IMI and threaten the integrity of its operations. By clearly defining what constitutes a conflict of interest and establishing a framework for disclosing, assessing, and mitigating such conflicts, we affirm our commitment to transparency and ethical behaviour. This policy applies not only to employees of the IMI but also to any individuals contracted by the organisation, including IMI approved centres, consultants, collaborators, board members, advisory council and volunteers, ensuring that all parties are held to the same standards of conduct.

Definition of Conflicts of Interest

A conflict of interest arises when an individual's personal interests, whether financial, familial, or professional, may interfere or appear to interfere with their responsibility to act in the best interest of our organisation. Conflicts can be both real and perceived, meaning that even the appearance of a conflict can undermine trust and confidence in our processes which include but is not limited to:

- the development of shared standards and/or frameworks in accordance with stakeholder requirements
- the development, delivery and award of regulated qualifications, apprenticeship standards or other IMI products or services in accordance with regulatory and or/other requirements
- the delivery of end point assessment services

Conflicts of interest can include but are not limited to:

Financial interests: where a person has a financial interest in a company which conducts business with the IMI.

Personal relationships: where a person is related to or has a close personal relationship with someone who is affiliated with a vendor or stakeholder of the IMI.

Professional affiliations: where a person holds a position (board member, consultant, etc.) with another company, which may influence their decisions or responsibilities at the IMI.

Gifts and hospitality: where the provision or acceptance of items, services, or experiences offered to individuals such as employees, board members, or officials, could potentially influence their judgment, decisions, or actions related to their responsibilities at the IMI.

Interests in assessment: Where a person has a personal interest in the result of an assessment, such as teachers or assessors working on behalf of the IMI or as a third party on behalf of the IMI.

Examples and Scenarios

General staff	An employee responsible for the procurement of services to the IMI realises that a company owned by a close relative is on the approved supplier list. The employee might favour this supplier in the bidding process or share insider information to benefit the relative's company.
Product developer	A contractor hired to develop training materials has a significant financial interest in a competitor organisation that offers similar training programs. This individual might inadvertently share information or insights that favour their own financial interests.
Consultant assessment developer	An assessment developer is asked to create exam questions for a specific qualification but is also providing tutoring services to learners preparing for that exam. There is a risk that the developer could create questions that align closely with the materials used in their tutoring sessions or alter their teaching to match that of the question answers, giving their students an unfair advantage.
External quality assurer	An external quality assurer who is assigned to evaluate a specific approved centre has previously worked with that centre as a consultant or staff member. Their past relationship may affect their objectivity in assessing the centre's compliance and quality assurance processes, leading to biased evaluations.
Assessor	An assessor conducting EPA on behalf of the IMI has a personal friendship or has directly taught at or currently teaching at the centre. The assessor might unconsciously let this relationship influence their grading, failing to maintain impartiality and fairness in the assessment process.
Strategic decision making	An executive responsible for strategic decision making at the IMI is contemplating a deal with a company in which they hold shares in. The executive may face a conflict between their duty to act in the best interests of the IMI and their desire to profit from their investment. They may inadvertently favour that external entity in negotiations, potentially compromising ethical standards.
Advisory board	An advisory board member serves on the board of a competing organisation in the same sector. This member may selectively share information that benefits their competing organisation, either by promoting their competitors' initiatives or by withholding insights that could positively impact their own organisation. This dual role creates a conflict between their obligation to provide impartial advice to the IMI advisory board and their loyalty to their competing organisation.
Receiving gifts from an IMI customer	An employee at the IMI receives gifts in thanks or as a favour, from a customer who has ongoing business with the organisation. This employee might feel a sense of obligation or favouritism towards that customer, potentially leading them to overlook compliance issues, performance standards, or other contractual obligations that should be met by the customer. Such favouritism could undermine the integrity of the employee's judgment and the overall compliance culture within the organisation.

Reporting Potential Conflicts

This policy covers both self-declaration and reporting of potential conflicts of interest and is to be adhered to by all employees and third-party contractors of the IMI. The purpose of this policy is to equip individuals with the tools to disclose conflicts of interest via the specified methods, to protect the integrity of the IMI's operations. In certain circumstances individuals may wish to report a conflict of interest confidentially. In this case they should follow the process set out in the Whistleblowing Policy. The person who handles your report will make an appropriate record of the conflict in the IMI Conflicts of Interest Register, without disclosing your identity.

Conflicts of interest must be completed by the individual on appointment, and annually on the anniversary each year using the templates provided in this policy. These must be submitted via email to the relevant manager or department head as deemed appropriate in each situation, for roles with the following responsibilities:

- Strategic decision making
- Senior operations
- Regulated assessment design
- Regulated assessment delivery
- Issuing of results for regulated products
- Quality assurance of external parties delivering regulated products
- Third party organisations and contractors delivering services on behalf of the IMI

It is also expected that individuals self-declare or report on behalf of others as soon as potential conflicts are identified at any time outside of the mentioned schedules.

Contract arrangements

Organisations or individuals contracted to support the development, delivery, award of IMI products and services or delivery of end-point assessment activity (e.g. assessors, employers, providers) must be aware of this policy, their requirement to comply with it and declare any potential conflicts of interest at the start or during their term of employment. A copy will be included within their contract held with the IMI and managed in accordance with this policy.

Review Process

Review

Conflicts will be evaluated by within 10 working days of submission and the criteria used to determine their significance will be:

- Nature of the conflict: understanding whether the conflict is financial, personal, professional, or involves external affiliations.
- Impact on decision-making: assessment of how the conflict may influence an individual's ability to act in the best interest of the organisation. This considers the role of the person involved and the decisions they influence.
- Duration and severity: evaluating whether the conflict is ongoing or is a one-time situation, as well as the seriousness of the potential conflict.
- Public perception: considering how the existence of the conflict may be perceived by stakeholders, including other members, applicants, or the public, to gauge potential reputational risk.
- Mitigation options: assessing available options to mitigate the conflict, such as recusal from specific decisions or tasks, and the feasibility of these options.

Based on the evaluation, the person/s responsible for assessing the potential conflict, will determine the appropriate course of action. This may include:

- Accepting the disclosure with no further action required.
- Implementing mitigation strategies, such as role adjustments or increased oversight on specific decisions.
- Recusal from involvement in related activities or decisions.
- In severe cases, consulting legal or external counsel for guidance.
- Documentation of assessment and outcomes

All evaluations and decisions made regarding disclosed conflicts of interest will be documented and templates are provided in this policy. This includes keeping a record of the assessment process, the determination made, and any actions taken or recommended. The documentation helps ensure compliance with organisation policies and provides a clear audit trail for accountability.

Feedback and Communication

The individual, and where required line manager, will be informed of the assessment outcome and any actions that will be taken. This communication should address how the conflict will be managed moving forward and may include recommendations for ongoing monitoring.

Ongoing Review

There will be a regular review of disclosed conflicts, especially in cases where circumstances change. Continuous monitoring is essential for maintaining ethical operations and ensuring that any new conflicts are promptly addressed.

Personnel assigned will have the appropriate level of training and competence and had no previous involvement or personal interest in the matter. If required, an external party will be appointed to support the review.

If any actual or potential conflict of interest identified is likely to cause an 'Adverse Effect' the Responsible / Accountable Officer will inform the relevant qualifications regulator in accordance with our Reporting Regulatory Notifications procedure. Regulatory references:

Regulator	Regulatory rule or guidance	Regulatory condition, criteria or principle
Ofqual	General Conditions of Recognition	A4 (A8.3, G4.6 & I1.2)
Qualifications Wales	Standard Conditions of Recognition	A4 (A8.3, G4.6 & I1.2)
CCEA Regulation	General Conditions of Recognition	A4 (A8.3, G4.6 & I1.2)
SQA Accreditation	Regulatory Principles	1, 13

Management of Conflicts

Based on the assessment, a management plan will be developed to address the specific conflict. This plan may include one or more of the following strategies:

Recusal from decision-making: individuals with a disclosed conflict may be required to recuse themselves from any discussions, deliberations, or decisions related to the conflicting interest. This is particularly essential for key strategic decisions and operational roles.

Role modification: changes may be made to the individual's role or responsibilities to eliminate or minimise the conflict. This could involve reassigning certain duties to another staff member or altering reporting lines.

Enhanced oversight: implementing additional oversight mechanisms may be necessary for situations where conflicts cannot be entirely mitigated. This may include increased review by senior management or the establishment of a committee to oversee relevant decisions.

Disclosure to affected parties: depending on the nature of the conflict, it may be appropriate to inform other stakeholders, such as board members, employees, or external partners, about the conflict and the steps taken to manage it.

All management plans and decisions related to conflicts of interest must be documented and reviewed on an agreed basis with all stakeholders. This documentation should include:

- Details of the identified conflict

- The assessment process and outcomes
- The management plan put in place
- Any communications with the affected individual or parties
- Record of ongoing monitoring and adjustments made to the management plan to include its impact and effectiveness at mitigating the risk.

Consequences of Non-compliance

All staff and named parties within this policy must adhere its requirements. Where there are significant failings to comply with the policy, disciplinary action may be taken and could include termination of employment, contract and IMI membership.

Training and Awareness

All employees and stakeholders should receive training on recognising, managing, and reporting conflicts of interest. This training should include updates on policies and procedures to ensure ongoing awareness and compliance.

Record-Keeping

Documentation of disclosures: All submitted conflict of interest disclosures, including the individual's name, position, date of submission, and details of the reported conflict, will be documented and maintained for a period of time as outlined in or data retention policy.

Centralised recordkeeping: a centralised, secure database or file system will be established to store all records related to conflict of interest disclosures. Access to this system will be restricted to authorised personnel only to protect the confidentiality of the information.

Records of review and management actions: documentation of the review process for each disclosure, including the assessment of the conflict and any actions taken to manage or mitigate the conflict, will be maintained. This will consist of meeting notes, decisions made, and any agreements reached regarding the resolution of the conflict.

Regular audits: the IMI will conduct regular audits of conflict of interest records to ensure compliance with this policy and to assess the effectiveness of the conflict of interest management process.

Confidentiality and data protection: all records will be treated as confidential and handled in accordance with applicable data protection regulations. Individuals' identities and sensitive information will be protected, and disclosures will only be shared with authorised personnel involved in the management of conflicts of interest.

Review and Update of the Policy

Policy review:

The IMI's Conflict of Interest Policy will be reviewed at least annually, or more frequently, if necessary, to ensure its relevance, effectiveness, and compliance with applicable laws and regulations. The review process will involve evaluating the policy's implementation, effectiveness in managing conflicts of interest, and alignment with best practices.

Responsibility for review:

The responsibility for conducting the annual review of the Conflict of Interest Policy will rest with the Executive Team. This will involve gathering feedback from stakeholders and assess any changes in regulatory or industry standards that may impact the policy.

Amendment process:

Any proposed amendments to the Conflict of Interest Policy will be developed during the review process based on findings, stakeholder input, and changes in applicable laws or regulations. Amendments will be presented to the Executive Team for consideration and approval.

Communication of amendments:

Once approved, any amendments to the Conflict of Interest Policy will be communicated to all employees, board members, and relevant stakeholders in a timely manner. The IMI will ensure that individuals are made aware of their responsibilities under the updated policy and provide necessary training or resources to facilitate compliance.

Documentation of amendments:

All amendments to the policy will be documented, including the date of approval, a summary of changes made, and the rationale for such changes. The updated policy version will be maintained in a centralised repository, clearly indicating the date of the latest revision for reference.

Continuous improvement:

The IMI is committed to continuous improvement in its ethical practices. Feedback on the Conflict of Interest Policy will be encouraged from employees and stakeholders to enhance its effectiveness and ensure it addresses emerging conflicts of interest appropriately.

Annex 1 – Conflict Of Interest Self Declaration Template

Conflict of Interest self-declaration

Name:

Position/Title:

Department:

1. Nature of conflict(s)

Please complete / delete as appropriate the relevant option(s) that apply to your situation:

Tick Appropriate	Type	Details
<input type="checkbox"/>	<u>Financial Interests:</u> I have a financial interest in [Company/Entity Name], which conducts business with the IMI.	
<input type="checkbox"/>	<u>Personal Relationships:</u> I am related to or have a close personal relationship with [Name] who is affiliated with [Company/Entity Name], a vendor, or stakeholder of the IMI.	
<input type="checkbox"/>	<u>Professional Affiliations:</u> I hold a position (Board Member, Consultant, etc.) with [Company/Entity Name], which may influence my decisions or responsibilities at the IMI.	
<input type="checkbox"/>	<u>Interest in Assessment:</u> I am responsible for the teaching and / or assessment or outcomes of learners at [Company / Entity Name]	
<input type="checkbox"/>	<u>Other Conflicts:</u> [Describe any other potential conflict not covered above.]	

2. Commitments and actions taken

I commit to the following actions to mitigate any potential conflict of interest:

Tick Appropriate	Action	Details
<input type="checkbox"/>	<u>Recusal from Decision-Making</u> (Recuse yourself from any discussions, deliberations, or decisions related to the conflicting interest)	
<input type="checkbox"/>	<u>Role Modification</u> (This could involve reassigning certain duties to another staff member or altering reporting lines)	
<input type="checkbox"/>	<u>Enhanced Oversight</u> (This may include increased review by senior management or a committee to oversee relevant decisions)	
<input type="checkbox"/>	<u>Disclosure to Affected Parties</u> (Inform other stakeholders, such as board members, employees, or external partners, about the conflict)	
<input type="checkbox"/>	<u>N/A as per review</u>	

3. Additional information

If there are any additional details or information relevant to the consideration of this declaration, please provide them here:

4. Self declaration

I, the undersigned, hereby declare that I have the stated potential conflicts of interest in relation to my role at the IMI. This declaration is made in accordance with the organisation's Conflict of Interest Policy to ensure transparency and ethical conduct.

I acknowledge that I have read and understood the IMI's Conflict of Interest Policy. I confirm that the information provided in this declaration is accurate and complete to the best of my knowledge. I agree to disclose any further conflicts of interest that may arise in the future.

Signature:

Date:

Submission Instructions

Please submit this completed declaration form to the relevant manager or department head. If you have any questions or require further clarification regarding the conflict of interest policy or the declaration process, please do not hesitate to contact us.

Confidentiality Statement

This declaration is confidential and shall be treated in accordance with the IMI's confidentiality and privacy policies. It will only be shared with individuals who have a legitimate need to know, in order to manage the conflict of interest in compliance with organisational policies.

Annex 2 – Reporting Potential Conflict Of Interest Template

Date:

Name of reporter:

Position/title:

Department:

Contact email:

1. Reported individual(s) information

Name of the individual(s) you are reporting conflict about:

Their position/Title:

Their department:

2. Nature of the potential conflict

Please indicate the nature of the potential conflict of interest:

Tick Appropriate	Type	Details
<input type="checkbox"/>	<u>Financial Interests:</u> A financial interest in (Company/Entity Name), which conducts business with the IMI.	
<input type="checkbox"/>	<u>Personal Relationships:</u> Related to or have a close personal relationship with (Name) who is affiliated with (Company/Entity Name), a vendor, or stakeholder of the IMI.	
<input type="checkbox"/>	<u>Professional Affiliations:</u> Hold a position (Board Member, Consultant, etc.) with (Company/Entity Name), which may influence decisions or responsibilities at the IMI.	
<input type="checkbox"/>	<u>Interest in Assessment:</u> Responsible for the teaching and / or assessment or outcomes of learners at [Company / Entity Name]	
<input type="checkbox"/>	<u>Other Conflicts:</u> Describe any other potential conflict not covered above.	

3. Suggested actions

What actions do you believe should be taken to address this potential conflict?

Tick Appropriate	Action	Details
<input type="checkbox"/>	<u>Recusal from Decision-Making</u> (Recuse from any discussions, deliberations, or decisions related to the conflicting interest)	
<input type="checkbox"/>	<u>Role Modification</u> (This could involve reassigning certain duties to another staff member or altering reporting lines)	
<input type="checkbox"/>	<u>Enhanced Oversight</u> (This may include increased review by senior management or a committee to oversee relevant decisions)	
<input type="checkbox"/>	<u>Disclosure to Affected Parties</u> (Inform other stakeholders, such as board members, employees, or external partners, about the conflict)	

4. Additional information

Please provide any additional information or context that may assist in understanding the potential conflict:

Acknowledgment and signature

I acknowledge that I have read and understood the IMI's Conflict of Interest Policy. I confirm that the information provided in this declaration is accurate and complete to the best of my knowledge. I agree to disclose any further conflicts of interest that may arise in the future.

Signature:

Date:

Submission Instructions

Please submit this completed declaration form to the relevant manager of department head. If you have any questions or require further clarification regarding the Conflict of Interest policy or the declaration process, please do not hesitate to contact us.

Confidentiality Statement

This declaration is confidential and shall be treated in accordance with the IMI's confidentiality and privacy policies. It will only be shared with individuals who have a legitimate need to know, in order to manage the conflict of interest in compliance with organisational policies.

Annex 3 – Conflict Assessment Review and Outcome Template

1. Background and context

This document reviews the potential conflict of interest involving:

Date:

Name of reporter:

Position/title:

Department:

Contact email:

It was disclosed that (insert name) has a potential conflict with the IMI and the following (insert from report as appropriate):

Tick Appropriate	Type	Details
<input type="checkbox"/>	<u>Financial Interests:</u> A financial interest in (Company/Entity Name), which conducts business with the IMI.	
<input type="checkbox"/>	<u>Personal Relationships:</u> Related to or have a close personal relationship with (Name) who is affiliated with (Company/Entity Name), a vendor, or stakeholder of the IMI.	
<input type="checkbox"/>	<u>Professional Affiliations:</u> Hold a position (Board Member, Consultant, etc.) with (Company/Entity Name), which may influence decisions or responsibilities at the IMI.	
<input type="checkbox"/>	<u>Interest in Assessment:</u> Responsible for the teaching and / or assessment or outcomes of learners at [Company / Entity Name]	
<input type="checkbox"/>	<u>Other Conflicts:</u> Describe any other potential conflict not covered above.	

2. Summary of review process

This review process included the following steps:

Step	Details / dates
Initial disclosure received on	Date:
Meetings held with individual on	Names: Date:
Information reviewed	Detail of outcome and recommendation
Relevant documentation reviewed	Documentation:
Stakeholder feedback reviewed	Name/s: Information:

3. Findings

Summarise the findings:	
Tick as appropriate	
<input type="checkbox"/> Conflict	<input type="checkbox"/> No conflict

4. Outcome

Tick Appropriate	Action	Details
<input type="checkbox"/>	<u>Recusal from Decision-Making</u> (Recuse from any discussions, deliberations, or decisions related to the conflicting interest)	
<input type="checkbox"/>	<u>Role Modification</u> (This could involve reassigning certain duties to another staff member or altering reporting lines)	
<input type="checkbox"/>	<u>Enhanced Oversight</u> (This may include increased review by senior management or a committee to oversee relevant decisions)	
<input type="checkbox"/>	<u>Disclosure to Affected Parties</u> (Inform other stakeholders, such as board members, employees, or external partners, about the conflict)	

5. Ongoing monitoring requirements

Monitoring requirements
Outline how any monitoring that is required will be carried out to ensure compliance and mitigate future conflicts:
Review date:
Training required:
Outline if applicable if additional training sessions on conflicts of interest and ethical standards are required:
<input type="checkbox"/> N/A
<input type="checkbox"/> Yes: required to complete any additional training sessions by (Insert timeframe).

6. Sign-Off

Name of reviewer:

Signature:

Date: