



# RoSPA

# Conflict of Interest

# Policy 2025

<b>Policy Owner</b>	ROSPA
<b>Policy Lead</b>	<b>Head of Qualifications</b>
<b>Audience</b>	<b>OFQUAL, Centres, Learners</b>
<b>Legislation and Regulation</b>	<b>OFQUAL Conditions of Recognition (GCoR) A4</b>
<b>Formally endorsed by</b>	<b>Chief Financial Officer</b>
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<b>Date effective from</b>	<b>October 1, 2025</b>

## **1. Guidance**

This policy should be read and implemented by RoSPA Centres involved in the delivery of our qualifications and RoSPA staff.

## **2. Introduction**

The purpose of this policy is to ensure everyone involved in the development, delivery or award of RoSPA Qualifications, including all recognised Centres, is aware that they have a duty to behave in a way that does not give rise to a conflict of interest.

## **3. Definitions**

- OFQUAL General Conditions of Recognition – GCoR
- Board of Trustees - BOT

## **4. Policy statement**

This document outlines our approach to managing conflicts of interest, both now and in the foreseeable future. It may be provided to the Qualifications Regulator upon request, to satisfy them of our ability to comply with their requirements in relation to conflicts of interest and to prevent such conflict becoming an 'Adverse Effect' (as defined by the regulators). Thus meeting our obligations to the Qualifications Regulator as stipulated by the General Conditions A4 [https://www.gov.uk/guidance/ofqual-handbook/section-a-governance \(see below\)](https://www.gov.uk/guidance/ofqual-handbook/section-a-governance (see below)).

This policy applies to all individuals working for or on behalf of RoSPA, including members of the Board of Trustees (BOT), RoSPA Governing Body, external contractors, third party suppliers, Centres, customers any associates and any subsidiaries or their employees.

## Policy

### Condition A4 Conflicts of Interest

**In general terms, a conflict of interest exists when an organisation or an individual has competing interests, which might impair it's or their ability to make objective, unbiased decisions.**

**Identifying conflicts of interest:**

**A4.1**

An awarding organisation must identify and monitor –

- (a) all Conflicts of Interest which relate to it, and
- (b) any scenario in which it is reasonably foreseeable that any such conflict of interest will arise in the future.

**A4.2** An awarding organisation must establish and maintain an up-to-date record of all conflicts of interest which relates to it.

**Managing conflicts of interest:**

**A4.3** An awarding organisation must take all reasonable steps to ensure that no conflict of interest which relates to it has an Adverse Effect

**A4.4.** Where such a conflict of Interest has had an Adverse Effect, the awarding organisation must take all reasonable steps to mitigate the Adverse Effect as far as possible and correct it.

### **Interests in assessment:**

**A4.5** An awarding organisation must take all reasonable steps to avoid any part of the assessment of a Learner (including by way of Centre Assessment Standards Scrutiny) being undertaken by any person who has a personal interest in the result of the assessment.

**A4.6** Where, having taken all such reasonable steps, an assessment by such a person cannot be avoided, the awarding organisation must make arrangements for the relevant part of the assessment to be subject to scrutiny by another person.

**A4.7** An awarding organisation must establish, maintain, and at all times comply with an up-to-date written conflict of interest policy, which must include procedures on how the awarding organisation intends to comply with the requirements of this condition.

**A4.8** When requested to do so by Ofqual in writing, an awarding organisation must promptly submit to Ofqual its conflict-of-interest policy and must subsequently ensure that the policy complies with any requirements which Ofqual has communicated to it in writing.

### **Definitions**

Conflict of interest exists in relation to an awarding organisation where –

- (a)** its interests in any activity undertaken by it, on its behalf, or by a member of its Group have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in a way that complies with its Conditions of Recognition
- (b)** a person who is connected to the development, delivery, or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in a way that complies with the awarding organisation's Conditions of Recognition, or
- (c)** An informed and reasonable observer would conclude that either of these situations was the case.

Part **(a)** covers conflicts of interest that relate to the awarding organisation. That is, situations where activities carried out by the awarding organisation itself (or on its behalf, or by a related company) might impair its ability to make objective, unbiased decisions about how best to develop, deliver or award its qualifications.

Part **(b)** covers conflicts of interest that relate to the individuals connected to any part of the development, delivery, or award of its qualifications. That is, situations where a particular individual's interests might impair their ability to make the objective, unbiased decisions that are necessary to ensure the awarding organisation can develop, deliver, and award its qualifications in line with the Conditions.

Part **(c)** extends our definition of conflict of interest to also include situations where an observer would perceive that an awarding organisation or individual has such a competing interest.

### **What is a personal interest?**

A personal interest is a conflict of interest that relates to a particular individual. All conflict of interests that fall under part **(b)** of our definition are personal interests, as are any perceived conflicts of interest under part **(c)** that relate to individuals, rather than to the awarding organisation itself.

## Risk management in relation to conflicts of interest

Assessing the risks to RoSPA arising from potential conflicts of interest is an integral part of our overall and ongoing risk management process. Identified conflicts of interest are mitigated as far as possible and are monitored as part of overall risk management and internal control processes. Periodic reviews of our conflicts of interest policy and procedures are undertaken as part of our governance and accountability processes. All existing and reasonably foreseeable conflicts of interest will be identified and monitored in line with this policy and escalated to the governing body where appropriate. Documented conflicts of interest will be monitored closely, particularly during periods of change, to mitigate the possible impact of any potential Adverse Effect (see definition below) as specified in our regulator's Conditions of Recognition.

*An Adverse Effect is defined (by Ofqual) as: An act, omission, event, incident, or circumstances has an Adverse Effect if it:*

**(a)** gives rise to prejudice to Learners or potential Learners, or

**(b)** Adversely effects the ability of the awarding organisation to undertake the development, delivery, or award of qualifications in accordance with its Conditions of Recognition

**II.** the standards of qualifications which the organisation makes available or proposes to make available, or

**III.** public confidence in qualifications.

## RoSPA's Responsibilities

To comply with the relevant regulatory requirements, RoSPA and its recognised Centres will:

- Take all reasonable steps to avoid conflicts of interest, including personal interest, by providing a system that protects themselves and others from criticism and compromise
- Ensure RoSPA staff are trained to understand how to recognise existing, actual or potential conflicts of interest, including personal interests at awarding organisation and Centre level and understand how to appropriately mitigate the associated conflicts
- Identify cases of conflict of interest, including personal interest, and where, if necessary, take action to mitigate or eliminate the potential damage of any adverse effects that could be caused

- Ensure conflicts of interest declared by RoSPA staff, members of the Board of Trustees and Governing Body are clearly recorded, stating how these conflicts have been appropriately eliminated/mitigated, with review dates
- Maintain an up-to-date conflict of interest register on the Qualification Management System (QMS), which is monitored and reviewed based on its risk level
- Ensure all recognised Centres have a written conflicts of interest policy that is implemented and demonstrates an understanding of what constitutes a potential and/or actual conflict of interest, including personal interests, how they identify, eliminate / mitigate and review any conflicts of interest
- Conduct on-going monitoring of recognised Centre's management of conflicts of interest procedures through Centre monitoring activities, e.g. moderations, Centre visits and quality assurance
- Take all reasonable steps to ensure Learners registered with recognised Centres are not assessed by anyone with a personal interest in the outcome of the assessment and, where it is unavoidable, ensure any part of the assessment that Trainer/Assessor conducts is scrutinised by someone else who does not have such an interest
- Take the necessary action to ensure the integrity of the assessment process is maintained when conflicts of interest cannot be avoided
- Ensure that any Centre's investigations are carried out by a person with the appropriate competence such as the Head of Centre, who has no personal interest in the outcome of the assessment (This will be a matter of judgement for ROSPA).
- Ensure any appeals panel includes at least one decision maker who was not one of RoSPA's moderators / External Quality Assurers (EQAs) or connected to RoSPA in some other way (Condition I1.2(c)).
- Ensure that anyone with a personal interest in the outcome of an investigation into potential malpractice does not carry out investigations of suspected or alleged malpractice

## **RoSPA's arrangements for implementation of conflict of interest**

### Identifying conflict of interests

All ROSPA staff understand how to identify existing or potential conflicts of interest at awarding organisation and Centre level. Conflicts of interest that are not identified and/or mitigated appropriately could lead to the occurrence of an Adverse Effect with respect to the delivery of qualifications and Learner assessments.

To maintain regulatory compliance, staff responsible for approving Centre Recognition applications, managing Recognised Centres, carrying out external quality assurance visits and completing moderations will be appropriately trained and updated in recognising conflicts and how to manage them.

#### ROSPA staff responsibility to declare a conflict of interest.

All ROSPA staff, including governing body members, have a responsibility to declare any existing and/or potential conflicts of interest, including personal conflicts, that may influence how they carry out their role. A declaration of interest form will be provided to all staff outlining the types of interest that should be declared, in line with this policy. The Responsible Officer reviews all completed declaration of interest forms and takes the necessary actions to record and appropriately eliminate or mitigate risks.

If the circumstances relating to any declared conflict of interest change at any stage, staff are required to provide updated details to ensure records held by ROSPA are current and accurate.

#### Managing Conflicts

All conflicts are documented in a conflict of interest register, that is held on the Qualification Management System (QMS) (**see below**). The register is maintained and monitored by the Responsible Officer (RO). This records the nature of the conflict/title, the mitigating actions to be taken and the timescales for any actions.

Item Ref	Conflict Title	Type	Likelihood	Impact	Conflict Rating	Trend	Review date	Staff member (if relevant)	Conflict owner	Centre conflict?	Linked items	Status	Date last modified	Last modified by
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#### **Monitoring conflicts of interest**

As an awarding organisation, ROSPA is required to monitor all conflicts of interest that relate to it, both internally and externally, to maintain compliance with regulatory requirements.

Processing Centre Recognition; All Centre applicants are asked to provide their conflict of interest policy, to demonstrate how conflicts are managed. If the Centre does not have a policy in place, the applicant will be contacted to submit one.

Observation; External Quality Assurers (EQAs) are responsible for carrying out practical observations for practical skills based assessments and completed Learner assessment paperwork. Through this activity, checks are made to ensure that any existing conflicts of interest previously declared by the Centre, or any conflicts of interest declared relating specifically to the course delivered (eg: a Trainer/Assessor is related to a Learner or a Trainer/Assessor is related to an Internal Quality Assurer) have been managed/mitigated appropriately. If it is identified through these checks that any conflict of interest has not been managed/mitigated appropriately, the Centre will be contacted to discuss the conflict and



ensure they have a clear understanding of the requirements in this policy. The Centre will be informed how such conflicts should be managed. The Centre's risk rating maybe increased and actions applied to the Centre.

Centre external quality assurance visits; External Quality Assurers (EQAs) are responsible for carrying out external quality assurance visits at recognised Centres, with a view to ensuring they continue to meet all the quality assurance and regulatory requirements. Through the course of these visits, EQAs will discuss existing and potential conflicts of interest with Centre staff, Trainers/Assessors and IQAs to ensure there is a clear understanding of the requirements relating to these and how these should be managed/mitigated.

Internal quality assurance monitoring; External Quality Assurers (EQAs) allocated to a Centre are responsible for monitoring the frequency and quality of the internal quality assurance completed by the Centres. If it is identified that any previously declared conflict of interest (eg: between the IQA and a Trainer/Assessor) or any conflict of interest/personal conflict relevant to a specific course has not been managed/mitigated appropriately, then the Responsible Officer will contact the Centre to discuss the conflict and ensure the Centre is aware of how to identify and manage/mitigate conflicts of interest. The EQA will also discuss any issues relating to internal quality assurance and the identification of conflicts of interest through the course of external quality assurance visits with a visit report sent to the Centre outlining the visit findings and any required actions.

Monitoring Conflicts of Interest Disclosure Forms received within RoSPA; The Responsible Officer is responsible for checking and recording the details of all completed and on-going monitoring. If at each governing body meeting any conflicts, including personal interests, that are not appropriately mitigated are identified, the Centre and individuals will be contacted to discuss the conflict and ensure there is a clear understanding of the requirements.

## **Arrangements within the RoSPA Group**

RoSPA (awarding organisation) is part of the RoSPA group. This relationship creates intrinsic, actual and some potential conflicts of interest. Assessing the risk to RoSPA (awarding organisation) of these conflicts of interests arising from this relationship is an integral part of RoSPA's overall and ongoing risk management process. Identified conflicts of interest are mitigated as far as possible and are monitored as part of overall risk management and internal control processes.

To ensure regulatory compliance with this relationship the arrangements below are implemented:

- Completion of a systematic breakdown of all the tasks, situations and activities undertaken for each shared resource within the RoSPA Group to identify conflicts of

interest (actual, personal and potential), with identified conflicts recorded on the QMS, eliminated and mitigated as far as possible. With monitoring as part of overall risk management and internal control processes

- RoSPA group staff receive conflict of interest training as part of their Organisational Induction program to ensure they understand their role and responsibilities in relation to conflicts of interest and requirements to declare any conflicts with additional input around departmental scenarios, if required. Mandatory annual training is provided to all shared resources for relevant conflict of interest scenarios and repeated if there are any changes
- RoSPA Governing Body meetings have a standard agenda item to review/receive updates on our arrangements for preventing/dealing with possible scenarios. They will have access to and will review the conflicts of interest log in the system (as illustrated above) at each meeting
- All RoSPA documents in the public domain will make it explicit that RoSPA (awarding organisation) operates independently from all other areas of RoSPA Group.

## Centre Responsibilities

Conflicts of interest in a Centre can arise in a variety of circumstances (this list is not exhaustive and is intended for guidance only)

- A person undertaking an assessment has an interest in the outcomes of the assessment, for example:
  - an internal Trainer/Assessor internally quality assures own assessments
  - a Trainer/Assessor assesses the work of a person connected to them
  - a Trainer/Assessor's pay is determined by the outcomes of assessments undertaken by them
  - Where there may be a conflict between income and regulatory responsibilities

It is a requirement of Centre Recognition approval that Centres must have a functioning policy in place that sets out the process to identify, manage, record and monitor arrangements. The policy must also include procedures for avoiding conflicts of interest and where a conflict of interest cannot be avoided, Centres **must** take all reasonable steps to avoid any part of the assessment and internal quality assurance of a Learner's work being undertaken by any person who has a personal interest in the result of the assessment. This includes internal marking of assessments and quality assurance activities. The Trainer/Assessor role and the Internal Quality Assurer role **must** be carried out separately. The Trainer/Assessor cannot quality assure their own assessments as this presents a conflict of interest. Where individuals have a personal interest in assessment decisions for a particular Learner, they must not be involved in the assessment or the quality assurance for that Learner. In cases where this does happen, the Centre must ensure that the assessment process is subject to scrutiny by those without personal interest.

Centres need to:

- Record all conflicts in an internal conflicts of interest register that is maintained and monitored on an ongoing basis. The Centre's conflict of interest register should record

the nature of the conflict, the mitigating actions to be taken and the timescales for these actions. The Centre's management team should **regularly** review potential conflicts to ensure that appropriate mitigation factors are in place

- Ensure Centre staff understand what constitutes a potential and/or actual conflict of interest and are aware of how to identify and manage conflicts of interest
- The head/appointed person for each Centre must ensure that all Centre staff or third parties such as Trainer/Assessors and Internal Quality Assurers involved in the delivery or administration of RoSPA courses must be able to identify any existing or potential conflicts of interest, as and when they arise
- Before delivering RoSPA courses, Centres are required to confirm all staff involved in delivery have read and understood the contents of this Conflicts of Interest Policy
- Declare all identified (potential and/or actual) conflicts of interest, which will have an impact on Centre operation and the delivery of RoSPA courses. These will be checked during Centre monitoring visits (to do this, a conflict of interest declaration must be completed). Centres must ensure that these forms contain all details of the conflict of interest that has arisen and the actions that have been taken to either avoid or mitigate the conflict
- Centres must inform RoSPA if there are any changes in circumstances relating to previously declared conflicts of interest. Centres must also ensure that their own conflict of interest records are updated when changes in circumstances occur or new conflicts are identified
- Ensure independent scrutiny takes place if a conflict of interest cannot be avoided when delivering a RoSPA course. Conflicts of interest that cannot be avoided through qualification delivery can also be mitigated through external scrutiny by RoSPA staff. For example, the Centre can request that an EQA be present during course delivery and Learner assessment (there may be a cost involved in this)
- In terms of appropriately mitigating conflicts of interest, it is important that Centres are aware that conflict mitigation is required to take place at the time of course delivery and assessment, rather than after the event. (This ensures the level of independent scrutiny required to provide assurance that course delivery and Learner assessment has been carried out fairly, and in line with all RoSPA requirements)
- Ensure that actions given by RoSPA relating to conflicts of interest are implemented. If any Centre has been given an action through any monitoring activity with respect to conflict of interest management, this action must be carried out with a view to maintaining ongoing compliance.

## **RoSPA action, for Centre non- compliance of this policy**

If it is identified through RoSPA monitoring activities that any conflict of interest has not been declared or managed appropriately by a Centre, then action will be taken to ensure that compliance is maintained. Such action includes:

- Issuing an action to a Centre in relation to conflicts of interest (with a view to restoring compliance)
- Centre visit to discuss conflict of interest identification and management
- In situations where approved Centres repeatedly fail to manage conflicts of interest in line with RoSPA and regulatory requirements, sanctions may be imposed on the Centre (please refer to the Sanctions Policy for further details)

## **Dealing with conflicts of interests and/or breaches to the procedures outlined in this policy**

Should any member of staff believe there has been a breach of this policy, or unforeseen conflicts of interest emerge, the Responsible Officer must be informed and an investigation carried out immediately along with a review of the associated procedures.

Should an external party feel there has been an actual conflict of interest involving RoSPA then they should raise the matter with the relevant management member of staff and/or the Governing Body, in accordance with the escalation arrangements in the log shown below. The relevant manager and/or Governing Body will then lead on an investigation into the incident and will ensure that the person(s) assigned to the investigation does not have any personal involvement/interest in the allegation.

Details of the incident, investigation and updated controls will be recorded in the relevant record in the conflicts of interest log. Upon updating the record in the system (or adding a new record) the system will send an email alert to all members of the Management team to inform them of the change.

At all times, we will ensure that personnel assigned to the investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter.

If the breach is also classified as an Adverse Effect, then the Responsible Officer, must promptly inform Ofqual in accordance with our procedure for dealing with Adverse Effects (see Governance Manual for further details). In doing so, they will inform Ofqual of the reasonable steps that we have taken or intend to take to prevent, correct or mitigate the Adverse Effect. Including details of any reviews we are/will carry out.

## **5. Responsibility and review**

We will review this document annually as part of our self-evaluation arrangements. However, a review will be commissioned earlier should an issue arise in relation to an actual or potential conflict of interest and/or in response to customer, Learner, or regulatory feedback.

## **Contact**

If you've any queries about the contents of the policy please:

- Telephone RoSPA on 0121 248 2115

- Email us at [qualifications@rospa.com](mailto:qualifications@rospa.com)
- Or write to us at:  
RoSPA  
RoSPA House  
28 Calthorpe Road  
Birmingham  
B15 1RP

## 6. Evidence

Effectiveness of this policy will be measured against monitoring activities and Centre visits by RoSPA.

### Approved by:

**Name:** Monique Klein      **Date:** 1/29/2026

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Monique Klein  
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### Appendix 1: Related Documents

Document Title	Relationship to this policy
Ofqual GCoR A4	Awarding Organisation approach to identifying and managing conflicts of interest <a href="#">Ofqual Handbook: General Conditions of Recognition - Section D - General requirements for regulated qualifications - Guidance - GOV.UK (www.gov.uk)</a>
Sanctions Policy	Repeated failure to manage conflicts of interest.

## Appendix II: Document Provenance

Date endorsed	Category	Summarise changes made	Reason for change	Consulted	Changes endorsed by
October 1, 2025	Policy Review	Email address	New email address	ELT, ARCom, BOT	BOT