

SCOTTISH QUALIFICATIONS AUTHORITY

POLICY NAME	Conflict of Interest – Appointees (including Qualifications Development Specialists)
VERSION NUMBER	V1.1
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POLICY OWNER	Jacqui Faulds
BUSINESS AREA OWNER	Appointee Management
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APPROVER	Jacqui Faulds, Head of Appointee Management
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Why do we need this policy?	As a regulated awarding body SQA must provide guidance to appointees in relation to conflict of Interest. The General Conditions of Recognition and the Regulatory Principles require SQA to publish a conflict of interest policy that helps us to identify, manage and mitigate conflict of interest.
Who does the policy apply to?	SQA Appointees (including Qualifications Development Specialists)
What support is available to help SQA implement this policy?	Contact a member of the Appointee Management Team by telephone or email at appointees@sqa.org.uk

1. Introduction

This policy outlines the principles and procedures for managing conflicts of interest for Appointees in order to maintain SQA's integrity as an awarding body and to protect the validity of our qualifications, assessments and services.

2. Scope

This policy applies to all SQA appointees.

3. Responsibilities

SQA is responsible for managing potential and actual conflicts of interest in the activities undertaken by its Appointees. It is the responsibility of individual appointees to recognise situations where a potential conflict of interest may arise or where others may consider a conflict exists.

Appointees must disclose any potential conflict of interest and follow the process set out in this policy. These responsibilities are also set out in appointee contractual documentation.

4. What is a conflict of interest

A conflict of interest is a situation where an appointee has competing interests or loyalties when carrying out their SQA activities that could compromise or appear to compromise their decisions.

Examples of conflicts of interest:

Conflicts of interest can arise in a variety of circumstances relating to appointee activities. The following are examples of situations (not an exhaustive list) that could lead to actual or perceived conflicts of interest that must be declared by Appointees:

- Undertaking SQA activities in a centre where the appointee is a member of staff or has some other connection eg as an adviser or consultant. *NB where this type of activity has been declared as an 'exception centre' as part of the contracting process, there is no need to submit a separate conflict of interest form.*
- Undertaking SQA activities in a centre where an appointee has friends or relatives taking SQA assessments or exams in that centre. *NB where this type of activity has been declared as an 'exception centre' as part of the contracting process, there is no need to submit a separate conflict of interest form.*
- Where an appointee undertakes SQA activities, but may have personal interests – paid or unpaid - in another business that uses SQA products and services.
- Where an appointee undertakes activities for another organisation that is in competition with SQA eg another awarding body.
- Where an appointee develops or delivers training materials that support SQA qualifications for another organisation eg writing text books/commercial prelim papers, delivering 'how to pass' workshops.

5. Managing conflict of interest

The following steps should be taken to manage conflicts of interest or potential conflicts of interest:

Appointee responsibilities:

- All appointees must familiarise themselves with this policy and comply with it.
- Where a conflict of interest or potential conflict of interest is identified by an appointee, he/she must make this known to SQA by submitting a 'Notification of potential conflict of interest' form to appointees@sqa.org.uk – this form can be found at: <https://www.sqa.org.uk/sqa/90797.8351.html>
- Where the appointee's circumstances relating to conflicts of interest change, he/she must complete and submit a new form to reflect the change and a further evaluation will be undertaken.

SQA responsibilities:

- All relevant SQA staff must be familiar with this policy and the process for managing conflicts of interest.
- All appointees will be reminded of the conflict of interest policy as part of each contracting process.
- Information provided by appointees identifying a potential conflict of interest will be evaluated by the SQA team responsible for the appointee activity and appropriate action agreed within 10 working days.
- This process is managed by the Appointee Management Team who will advise appointees of the outcome of the evaluation and any actions required.
- All conflict of interest forms will be stored electronically by the Appointee Management team for a period of 2 years.

6. Potential actions

- Appointees are not allocated activities within a particular centre.
- Appointees are offered alternative activities where possible.
- Appointees who have access to confidential assessment materials eg items or question papers, are not allowed to be involved in writing commercial revision/prelim materials, or developing/delivery training events relating to the subject/level of their appointment.
- Appointees are unable to continue in their appointee role.

7. Compliance

If a conflict of interest is identified by SQA where an appointee has not complied with this policy, Appointee Management will investigate and, if necessary (as determined by SQA), withdraw their appointee contract.

All personal data provided by appointees in regard to this policy will be maintained and processed in line with their contractual agreement with SQA.