



Conflict of Interest Policy and Procedure

Education, assessment, quality assurance and corporate activity

Document ID	Version	Owner	Approved by
SV-COI-001	1.0	Raza Ali, Responsible Officer	Raza Ali, Managing Director
Effective date	Review		Availability
5 Aug 26	At least annually and after a material incident, relationship or regulatory change		Staff and learner-facing policy; register restricted

Scope: All StepVisor directors, staff, contractors, tutors, assessors, internal quality assurers, consultants, volunteers, learners and relevant third parties. It applies across every awarding organisation, qualification, course, programme and business activity.

1 Purpose and policy statement

StepVisor Ltd will identify, declare, assess, manage and review actual, potential and perceived conflicts of interest so that decisions remain fair, objective, transparent and capable of withstanding scrutiny. A conflict is not necessarily wrongdoing; failure to disclose or manage it may create unfairness, threaten qualification standards, harm learners, breach contractual or regulatory requirements and damage confidence in StepVisor.

Core duty: Anyone in scope must disclose a conflict as soon as they know, or reasonably should know, that it exists. They must not participate in the affected activity until an authorised person has recorded the management decision.

Objectives

- Protect learners and the integrity of teaching, assessment, internal quality assurance, results and certification.
- Ensure recruitment, admissions, procurement, contracting, complaints, appeals and business decisions are impartial.
- Meet the requirements of relevant awarding organisations, regulators, funders and professional bodies.
- Maintain a confidential, auditable register and evidence that controls are effective.
- Encourage early, good-faith disclosure without retaliation.

2 Definitions

Term	Meaning
Conflict of interest	A situation in which a person's interests, relationships, duties or loyalties could improperly influence—or reasonably appear to influence—their judgement or actions for StepVisor.
Actual conflict	The competing interest is presently influencing or directly connected to a decision or activity.
Potential conflict	Circumstances could develop into a conflict, although they have not yet done so.
Perceived conflict	A reasonable, informed observer could believe a conflict exists, even if the person believes they remain impartial.
Personal interest	A financial, family, friendship, romantic, employment, professional, political, reputational or other benefit or detriment affecting the person or someone connected to them.
Connected person	A family member, partner, close associate, business, employer, client or organisation with which the individual has a significant relationship.
Conflict owner	The person whose interests or duties create the conflict.
Decision-maker	The authorised, unconflicted person who assesses the declaration and approves controls.

The test is objective: would a reasonable, informed person consider that the interest could affect—or appear to affect—the person's independence? If uncertain, disclose.

3 Roles and responsibilities

Role	Responsibilities
Managing Director / Responsible Officer - Raza Ali	Owns policy, register and external notifications; decides material conflicts; appoints independent decision-makers; reports trends to management.
Head of Quality / IQA - Farzana Nazir	Identifies assessment-quality conflicts; ensures assessor/IQA independence; adjusts sampling, blocks claims and verifies corrective action.
Admissions / Support / DPO - Muhammad Umar	Identifies admissions, learner-support, safeguarding and data-access conflicts; protects confidentiality of declarations.
Tutor / Assessor - Muhammad Omar	Declares learner/workplace relationships and interests before assessment; does not assess where impartiality or authenticity may be compromised.
All staff and contractors	Complete declarations, update them immediately, follow controls and report undisclosed conflicts.
Learners and third parties	May disclose a relationship or concern and will be told how to raise it without disadvantage.

Conflict involving Raza Ali: Where Raza Ali is conflicted, he must take no part in the decision. Farzana Nazir or a suitably independent external person will decide and document the controls. If no sufficiently independent person is available, StepVisor will seek guidance from the relevant awarding organisation or appoint external oversight.

4 Situations that must be considered

Education, assessment and quality assurance

- Assessing, teaching or quality assuring a family member, partner, close friend, household member, employee, employer, manager, business associate or person with whom there is a significant dispute.
- Assessing one's own work, quality assuring one's own assessment decision, or sampling work where the IQA contributed materially to the evidence or decision.
- Pressure linked to achievement rates, payment, recruitment, retention, employer targets or certification deadlines.
- A tutor or assessor offering paid private support to learners they assess without prior approval.
- Accepting witness testimony from someone whose relationship or incentives undermine reliability.
- A staff member influencing an appeal, complaint, malpractice investigation or reasonable-adjustment decision in which they were involved.
- Accessing learner records outside allocated duties or using confidential awarding-organisation materials for another purpose.

Corporate and employment activity

- Recruiting, supervising, appraising, disciplining, remunerating or awarding work to a connected person.
- Holding another role, consultancy, directorship, ownership or financial interest that competes with or supplies StepVisor.
- Selecting a supplier, landlord, venue, placement, employer partner or contractor in which the decision-maker has an interest.
- Using StepVisor information, learners, systems, opportunities, brand or property for personal benefit.
- Receiving gifts, hospitality, discounts, commissions, referral fees or benefits that could influence or appear to influence a decision.
- Personal, political or professional relationships affecting admissions, learner support, safeguarding, complaints or data-protection decisions.
- Duties to another awarding organisation, provider or employer that conflict with StepVisor obligations or confidentiality.

5 Declaration requirements

Who must declare and when

- Directors, staff, contractors and relevant associates complete a declaration before appointment or allocation to work.
- Everyone refreshes their declaration annually, even if they declare “none”.
- A new or changed interest is declared immediately and before any affected action.
- A declaration is made for each learner/cohort, assessment or quality-assurance allocation where relevant.
- Meeting attendees declare agenda-specific interests at the start; the minutes record withdrawal and the decision.
- Procurement, recruitment, appeals, complaints, investigations and certification panels make case-specific declarations.

What to disclose

Provide enough information for an informed decision: people and organisations involved, the relationship or interest, affected activity, timing, possible benefit/detriment, previous involvement, relevant confidentiality and any proposed mitigation. Do not include unnecessary sensitive personal data.

No self-management: The person declaring may suggest controls but cannot decide that the conflict is immaterial or adequately managed. Silence, informal verbal agreement or a private assurance of impartiality is not sufficient.

6 Assessment and decision procedure

1. Declare: complete the form or notify Raza Ali immediately. If urgent, make a verbal declaration, stop the affected activity and submit the written record promptly.
2. Log: assign a case/reference number, restrict access to the record and acknowledge the declaration.
3. Protect: pause the decision, assessment, claim, payment, appointment or access if continuing could create harm. Preserve records and deadlines.
4. Check independence: identify an unconflicted decision-maker. If Raza Ali is conflicted, use the alternative route in section 3.
5. Assess risk: consider the nature and closeness of the interest, role and discretion, value or benefit, learner/standard impact, confidentiality, detectability, duration and the view of a reasonable observer.
6. Decide: record whether no conflict exists, the conflict is manageable, or the activity must not proceed.
7. Control: specify actions, owner, start/expiry, monitoring and communication.
8. Notify: inform only those who need to implement or understand the control; protect personal data. Notify the relevant awarding organisation or regulator where required.
9. Review: verify implementation at the stated date and whenever circumstances change.
10. Close: record evidence that the conflict ended or is permanently removed. Retain the audit trail.

7 Risk assessment and management options

Factor	Lower risk indicators	Higher risk indicators
Relationship	Distant, historic or incidental.	Close family, financial, employment, supervisory, romantic or hostile relationship.
Influence	No decision authority; transparent routine task.	Assessment, quality assurance, recruitment, payment, appeal, investigation or certification authority.
Benefit/detriment	No plausible personal advantage.	Financial, career, target, reputational or personal outcome.
Safeguards	Independent review and clear audit trail.	Sole decision, weak oversight, inaccessible evidence or deadline pressure.
Impact	Minor administrative matter, easily corrected.	Learner fairness, safety, qualification validity, data rights or regulatory confidence at risk.
Duration	One-off and time-limited.	Ongoing or repeated relationship.

Available controls

- Record and monitor with no further restriction where the reasonable-observer test is satisfied.
- Disclose the relevant fact to affected decision-makers without unnecessary personal detail.
- Remove access to records, meetings, communications or systems.
- Require withdrawal from discussion, decision or voting and record this in minutes.
- Reassign teaching, assessment, internal quality assurance, support, investigation or approval.
- Use independent second marking, enhanced sampling, countersigning or external review.
- Change reporting lines, duties, targets, payment arrangements or procurement roles.
- Apply time-limited restrictions or divestment/disposal of the interest.
- Do not proceed with the activity, appointment, supplier or allocation where controls cannot protect impartiality.

Assessment safeguard: An internal quality assurer must never quality assure their own assessment decision. An assessor must not assess a learner where a personal interest creates a risk to impartiality that cannot be demonstrably controlled. Certification remains blocked while a material conflict action is open.

8 Gifts, hospitality, commissions and external interests

Gifts and hospitality

- Cash, cash equivalents, personal loans and secret commissions must never be accepted.
- Gifts or hospitality connected to an active assessment, appeal, procurement, investigation or certification decision must be declined.
- Modest, infrequent items may be accepted only when lawful, culturally appropriate, incapable of influencing the recipient and permitted by the Managing Director; they must be declared where they could reasonably appear influential.
- Repeated, valuable or unusual offers must be recorded even if declined.
- StepVisor funds and hospitality must not be used to secure improper advantage.

Outside work and interests

- Disclose relevant employment, consultancy, ownership, directorship, partnership, referral arrangement or substantial volunteering role.
- Do not compete unfairly, solicit StepVisor learners/clients, misuse confidential information or deliver conflicting services during StepVisor time.
- Obtain approval before offering private paid tuition or assessment support to a current StepVisor learner.
- External activity must not undermine availability, competence, safeguarding, confidentiality or awarding-organisation requirements.

9 Undeclared conflicts, concerns and investigations

Anyone may report a suspected undisclosed or unmanaged conflict to Raza Ali. If it concerns Raza Ali, report to Farzana Nazir. Concerns may also be raised through the complaints, safeguarding, whistleblowing or malpractice route, depending on the issue.

Response

- 11.Acknowledge and assess immediate risk; suspend affected decisions or access where necessary.
- 12.Protect evidence, confidentiality and the person raising a good-faith concern.
- 13.Appoint an independent investigator and define scope.
- 14.Give the person concerned a fair opportunity to respond.
- 15.Decide whether a conflict existed, disclosure was required, controls were breached or outcomes were affected.
- 16.Correct affected decisions, reassess work, extend sampling, notify learners/awarding organisations or take other proportionate action.
- 17.Apply disciplinary or contractual action where appropriate and review systemic causes.

Deliberate non-disclosure, misleading information, retaliation, failure to follow controls or interference with an investigation may constitute misconduct, malpractice or maladministration.

10 Learners, appeals, complaints and fair treatment

- Learners are told that staff relationships or interests may need to be disclosed and managed.
- A learner may raise a concern about assessor, tutor, IQA or decision-maker impartiality without disadvantage.
- The person complained about does not investigate or decide the complaint/appeal.
- Relevant evidence, assessment decisions and audit trails are preserved.
- StepVisor explains the outcome and safeguards to the extent possible without disclosing another person's confidential information.
- Where impartial internal review is impossible, StepVisor appoints an external reviewer or follows the relevant awarding organisation's escalation route.

11 Register, confidentiality and retention

Raza Ali maintains the master Conflict of Interest Register. Access is limited to people who need it for decision, implementation, quality assurance, audit or lawful disclosure. A published policy may be available to learners and staff, but individual declarations are not published.

Register content

- Case ID, declarer, role and date.
- Interest/relationship and affected activity.
- Actual, potential or perceived classification.
- Risk assessment and decision-maker.
- Controls, owners, dates and communication.
- Awarding-organisation/regulatory notification decision.
- Review evidence, change and closure.
- Related complaint, appeal, malpractice or corrective-action references.

Records are retained under StepVisor's approved retention schedule, applicable awarding-organisation requirements and any complaint, investigation, legal or audit hold. Information is minimised, accurate, securely stored and disposed of confidentially.

12 Training, monitoring and review

- Policy induction before duties are allocated and annual refresher training.
- Annual “nil or interests declared” returns from all staff and contractors.
- Case-specific declarations for assessment, IQA, recruitment, procurement, appeals, complaints and investigations.
- Quarterly register review by the Responsible Officer and Head of Quality, including overdue controls and emerging patterns.
- Sampling of learner allocations, assessor/IQA independence, supplier selection and meeting minutes.
- Annual management review of effectiveness, incidents, external feedback and policy changes.

Effectiveness indicators

Indicator	Expected control
Annual declarations	100% completed before or by review deadline.
New interests	Declared before participation or immediately on discovery.
Material controls	Named owner and deadline; no overdue certification-critical action.
Assessment independence	No self-IQA and no unmanaged personal-interest allocation.
Register review	Quarterly and documented.
Training	Completed before allocation and refreshed annually.

Appendix A Conflict of Interest Declaration Form

Field	Declaration / record
Case ID / date	
Name / role / employer (if external)	
Type: actual / potential / perceived	
People / organisations connected	
Nature of interest or relationship	
StepVisor activity, learners or decisions affected	
Possible benefit, detriment or appearance of influence	
Previous or planned involvement	
Immediate action taken / activity paused	
Suggested controls	
Other relevant information	
Declarer signature / date	

Decision

Field	Decision / record
Independent decision-maker / conflict check	
Risk assessment and reasonable-observer conclusion	
Decision: no conflict / manageable / activity prohibited	
Controls, owner, start and expiry/review date	
People to inform and confidentiality limits	
Awarding-organisation/regulatory notification	
Decision-maker signature / date	
Review and closure evidence	

Appendix B Conflict of Interest Register

ID/date	Person / role	Interest and affected activity	Risk / decision	Controls / owner / due	Review / closed

Meeting declaration record

Meeting/date	Person	Agenda item / interest	Action: withdraw / remain / control	Minute reference

Appendix C Allocation and independence checklist

Check	Yes / No / N/A	Evidence / action
Learner and assessor relationship checked		
Tutor/assessor financial or private-tuition interest checked		
Assessor is not assessing their own evidence or decision		
IQA is independent of the assessment decision		
Witness relationship and incentive checked		
Employer/manager pressure or target risk considered		
System access matches allocation only		
Previous complaint, dispute or investigation considered		
Controls approved before assessment begins		
Certification block applied if action remains open		

Appendix D Implementation and approval checklist

Action	Owner	Evidence / complete
Issue declarations to all named staff and relevant contractors.	Raza Ali / relevant lead	
Create the restricted master Conflict of Interest Register.	Raza Ali / relevant lead	
Add conflict checks to recruitment, admissions, allocation, procurement, meetings, appeals, complaints and investigations.	Raza Ali / relevant lead	
Review current learner-to-assessor and assessor-to-IQA allocations.	Raza Ali / relevant lead	
Document gifts/hospitality and outside-interest controls.	Raza Ali / relevant lead	
Train staff and record acknowledgements.	Raza Ali / relevant lead	
Publish the learner/staff-facing policy and reporting route.	Raza Ali / relevant lead	
Complete a quarterly review schedule and management reporting format.	Raza Ali / relevant lead	
Confirm notification requirements for each awarding organisation and contract.	Raza Ali / relevant lead	
Approve the policy and close or time-bound all actions.	Raza Ali / relevant lead	

Approval

Name / role	Signature	Date
Raza Ali, Managing Director / Responsible Officer	__ Raza Ali _____	__ 5 Aug 26 _____
Farzana Nazir, Head of Quality / IQA	__ Farzana Nazir _____	__ 5 aug 26 _____

Approval gate: This policy becomes operational when approved. Existing interests and allocations must be reviewed promptly; absence of a recorded declaration must not be treated as evidence that no conflict exists.