

SPM Development Services Ltd

Conflict of Interest Policy

Reviewed and Updated: September 2026

Next Review: September 2027, or sooner if awarding organisation requirements, statutory guidance or SPM's circumstances change.

Approved by: Simon Piper-Masha

Related Policies and Procedures:

Assessment Policy (2026)

Quality Assurance and Review Policy (2026)

Malpractice and Maladministration Policy (2026)

Fair Assessment Appeals Procedure (2026)

Safer Recruitment Policy (2026)

Safeguarding and Child Protection Policy (2026)

Whistleblowing Policy (2026)

Purpose

This policy explains how SPM Development Services Ltd identifies, records and manages actual, potential or perceived conflicts of interest.

SPM is committed to ensuring that decisions are fair, impartial and not improperly influenced by personal, professional, financial or other interests.

SPM will comply with current OCN London requirements and notify OCN London promptly where a conflict may affect the delivery, assessment, internal quality assurance or certification of a qualification.

Scope

This policy applies to the Head of Centre, staff, self-employed tutors, mentors, assessors, Internal Quality Assurers, contractors, consultants and anyone else acting on behalf of SPM.

It covers all areas of SPM's work, including:

- Recruitment and allocation of work.

- Learner referrals and admissions.
- Teaching, mentoring and support.
- Assessment and internal quality assurance.
- Learner registration and certification.
- Purchasing and financial decisions.
- Complaints, appeals and investigations.
- Safeguarding decisions.
- Relationships with commissioners, awarding organisations and other providers.

Definition

A conflict of interest arises where a person's personal, professional, financial or other interests could influence, or could reasonably be seen to influence, their judgement or actions when carrying out work for SPM.

A conflict may be:

- Actual, where the conflict currently exists.
- Potential, where circumstances could develop into a conflict.
- Perceived, where another person could reasonably believe that a conflict exists, even if the person concerned believes they can act impartially.

A conflict is not automatically wrongdoing. It must, however, be disclosed promptly so that it can be assessed and managed.

Examples of Conflicts of Interest

Conflicts may include:

- Assessing or internally quality assuring the work of a relative, close friend, partner or someone with whom the person has a significant personal relationship.
- Internally quality assuring one's own assessment decisions or assessment materials.
- Making decisions about a learner where there is a personal relationship, dispute or other interest that could affect impartiality.
- A tutor providing excessive assistance to improve a learner's assessment result.

- Having a financial interest in an organisation supplying goods or services to SPM.
- Receiving gifts, hospitality, payments or other benefits that could influence a decision.
- Being involved in recruitment or allocation of work concerning a relative, close friend or business associate.
- Holding roles with another provider, commissioner or awarding organisation that create competing responsibilities.
- Using confidential SPM, learner or awarding organisation information for personal or commercial benefit.
- Taking part in a complaint, appeal, malpractice investigation or safeguarding decision where the person has prior involvement or a personal interest in the outcome.
- Personal relationships or outside activities that could affect professional boundaries, safeguarding decisions or the fair treatment of learners.

This list is not exhaustive. Anyone who is unsure must disclose the circumstances rather than decide for themselves that no conflict exists.

Responsibilities

The Head of Centre has overall responsibility for ensuring that conflicts of interest are identified, recorded and managed appropriately.

The Head of Centre will:

- Maintain oversight of the conflict of interest register.
- Decide how identified conflicts will be managed.
- Ensure that OCN London or another relevant organisation is notified where required.
- Make alternative arrangements where the Head of Centre has a conflict.

The Internal Quality Assurer will:

- Identify conflicts that could affect assessment or internal quality assurance.
- Ensure that assessors do not internally quality assure their own assessment decisions.
- Arrange alternative assessment or IQA where necessary.
- Record relevant decisions and inform the Head of Centre.

Everyone working on behalf of SPM must:

- Consider whether their interests or relationships could create a conflict.
- Disclose actual, potential or perceived conflicts promptly.
- Provide complete and accurate information.
- Follow any measures put in place to manage the conflict.
- Report any previously undisclosed conflict that comes to their attention.
- Update their declaration if circumstances change.

Declaration and Disclosure

Conflicts of interest must be disclosed:

- When a person begins working with SPM.
- When taking on a new role, learner, qualification or responsibility.
- As soon as a new conflict arises or circumstances change.
- During annual compliance and quality assurance checks.

A disclosure should include:

- The people and organisations involved.
- The nature of the interest or relationship.
- The activity or decision that may be affected.
- Any immediate action already taken.

Disclosures must be made to the Head of Centre.

Where the conflict concerns the Head of Centre, it must be referred to a suitably independent person or, where relevant, directly to OCN London or the commissioning authority.

Assessment and Internal Quality Assurance

Assessment and internal quality assurance decisions must be fair, independent and based on evidence.

An assessor must not assess a learner where a personal or financial relationship could affect, or reasonably be perceived to affect, the assessment decision unless appropriate safeguards have been agreed and recorded.

An Internal Quality Assurer must not internally quality assure their own assessment decisions. Where a person acts as both assessor and IQA within SPM, another suitably competent person must carry out the required independent quality assurance of that person's assessment decisions.

Any conflict affecting assessment, learner evidence, reasonable adjustments, achievement or certification must be reported immediately to the IQA and Head of Centre.

Learner results or certification claims must not be submitted until the conflict has been reviewed and any necessary independent checks have been completed.

Managing Conflicts of Interest

The Head of Centre will assess each disclosed conflict and decide whether it can be avoided or managed.

Possible actions may include:

- Recording the conflict with no further action where the risk is minimal.
- Removing the person from a decision or discussion.
- Reallocating a learner, assessor, IQA or other responsibility.
- Arranging independent assessment, quality assurance or review.
- Restricting access to particular information.
- Requiring additional supervision, sampling or monitoring.
- Declining a gift, payment, contract or other benefit.
- Asking the person to withdraw from one of the conflicting activities.
- Referring the matter to OCN London, a commissioning authority or another relevant organisation.
- Prohibiting the activity where the conflict cannot be managed adequately.

The action taken must be proportionate to the nature and level of risk.

Conflict of Interest Register

SPM will maintain a secure conflict of interest register.

The register will record:

- The name and role of the person concerned.
- The date the conflict was disclosed or identified.
- A description of the actual, potential or perceived conflict.
- The activity, learner, qualification or decision affected.
- The assessment of risk.
- The action agreed to manage or remove the conflict.
- The person responsible for monitoring the action.
- The date the conflict was reviewed or closed.

The register will be reviewed regularly and whenever circumstances change.

Notification to OCN London and Other Organisations

SPM will notify OCN London promptly where a conflict of interest:

- Has affected or could affect the integrity of an OCN London qualification.
- Could influence assessment, internal quality assurance, learner results or certification.
- May constitute malpractice or maladministration.
- Cannot be adequately managed by SPM.
- Is otherwise required to be reported under current OCN London procedures.

SPM will follow any instructions given by OCN London and will not take action that could prejudice an awarding organisation investigation.

Relevant commissioning authorities, examination centres or other organisations will also be informed where required.

Safeguarding

A conflict involving a safeguarding concern, professional boundary, relationship with a learner or decision about a child or young person must be reported immediately to the Designated Safeguarding Lead.

Safeguarding action must not be delayed while a conflict of interest is considered.

Where the Designated Safeguarding Lead has a conflict, the matter must be referred through the alternative reporting arrangements in SPM's Safeguarding and Child Protection Policy.

Conflicts involving allegations about someone working with children will be managed in accordance with SPM's safeguarding procedures and current statutory guidance.

Confidentiality and Data Protection

Information about conflicts of interest will be handled sensitively and shared only with those who need it to assess or manage the conflict or meet legal, safeguarding, commissioning or awarding organisation requirements.

Records will be stored securely in accordance with SPM's Privacy and Data Protection Policy.

Failure to Declare a Conflict

Failure to disclose a relevant conflict, providing misleading information or failing to follow agreed management arrangements may be treated as misconduct, a breach of contract, malpractice or maladministration.

SPM will take proportionate action and notify OCN London or another relevant organisation where required.

Complaints and Whistleblowing

Concerns about an undisclosed or poorly managed conflict may be raised with the Head of Centre.

A personal complaint may be made under SPM's Complaints Policy and Procedure.

Concerns about wrongdoing that the person reasonably believes to be in the public interest may be raised under SPM's Whistleblowing Policy.

No one will be disadvantaged for raising a genuine concern.

Monitoring and Review

The Head of Centre will monitor declared conflicts and ensure that agreed actions remain effective.

The IQA will review conflicts affecting assessment and quality assurance as part of SPM's annual quality assurance arrangements.

This policy will be reviewed annually, or sooner if a conflict arises, an incident identifies a weakness or awarding organisation or statutory requirements change.