Conflict of interest policy

Pearson Qualification Services

Version 7.2 / January 2018

Contents

Who and what is this policy for:

All staff (including assessment associates and contractors) need to be aware of the potential for a conflict of interest.

As a regulated awarding organisation the General Conditions of Recognition and the Regulatory Principles require us to publish a conflict of interest policy that helps us to identify, manage and mitigate conflict of interest.

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Owner Head of Regulatory Monitoring and Risk
Authorised by Responsible Officer
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Pearson Education Ltd – Our Mission and Values

Welcome to Pearson, the world's leading learning company. We have a simple mission: to help people make more of their lives through learning. Whether it's at home, in the classroom or in the workplace, learning is the key to improving our life chances. We are the UK's largest awarding body and we are regulated by Ofqual (England), SQA Accreditation (Scotland), CCEA Regulation (Northern Ireland) and Qualifications Wales (Wales). We offer academic and vocational qualifications that are globally recognised and benchmarked, with educational excellence rooted in names like Edexcel, BTEC, and LCCI.

Our regulatory policies are integral to our approach and articulate in a consistent way how we meet regulatory requirements. These policies are designed to support centres and learners with the design, delivery and award of Pearson qualifications and services.

Purpose

The purpose of this policy is to protect our integrity as a business and the integrity of our qualifications and assessments. It is designed to support our staff by providing guidance on handling possible conflicts of interest that may happen as a result of our role as an awarding organisation and end-point assessment organisation (EPAO). This policy:

- Defines what is meant by conflict of interest.
- Describes the role of conflict of interest in the context of working with, or for, an awarding organisation and EPAO.
- Sets out the responsibilities for managing conflict of interest at each level in the organisation.

1. Who does this policy apply to?

1.1 This policy applies to individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with our qualifications, tests and assessments, and supporting resources and services. This includes:

- Directors.
- Employees.
- Home workers.
- Contractors.
- Agency workers.
- Assessment Associates.
- Verifiers and examiners.
- Freelance staff.
- End-point assessors.

2. What is a conflict of interest

2.1 A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

2.2 Conflicts of interest can arise in a variety of circumstances relating to awarding organisation or EPAO activity. The following are examples of conflicts and do not represent an exhaustive list:

- Where the training delivery function and the awarding function rest within one organisation

- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation

- Where someone works for or carries out work on our behalf, who has friends or relative taking our assessments or exams

- When an individual has interests that conflict with his or her professional position

- Where someone works for or carries out work on our behalf, but may have personal interests –paid or unpaid- in another business which either uses our products and services, or produces similar products.

- Where an individual/organisation is undertaking the end-point assessment of apprentices for an organisation, within which they have previously trained, managed or assessed the same apprentice(s), during the 'on-programme' phase of their apprenticeship.

3. Our commitment to managing conflict of interests

3.1 We will:

- Make sure that when one part of Pearson creates and follows a procedure, it does not conflict with our regulatory responsibility as an awarding organisation and EPAO.

- Review our processes every year to make sure that all conflicts of interest or potential conflicts of interest are managed and resolved.

- Check that the contracts with our assessment associates are clear and set out the obligations on them to manage conflicts of interest arising from other activities that they undertake.

- Make sure that anyone with access to confidential assessment material for a qualification or EPA does not deliver or be present at training events regarding that product.

- Make sure that all staff and assessors of end-point assessment declare any interest of friends or family sitting upcoming Pearson assessments via declarations@pearson.com

- Make sure that individuals who have previously trained, managed or assessed apprenticeship on-programme delivery will not be involved in the development of test items or assessment instruments, or the delivery of end-point assessment, for the same individual or group of apprentices.

- Make sure that there is independence between on-programme training and end-point assessment for the same group of apprentices for the same standard (even where there is a separation of training and assessment).

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4. Who is responsible for managing and reporting conflicts of interest

The Pearson Education Ltd Board

- The ultimate responsibility for this policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Pearson Education Ltd Board.

Managers in Pearson

- Managers in each department are responsible for communicating this policy to all relevant individuals within their areas of responsibility annually.

Directors and Senior Managers in Pearson

- All departments must review their procedures annually to make sure that they anticipate and manage potential or actual conflicts of interest.
- Potential or actual conflicts of interest are raised at divisional and departmental management meetings.
- Line managers are responsible for checking that all new staff receive conflict of interest training.
- Any potential or actual conflict of interest is logged within the Division or Department. The line manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to their Director and/or the Responsible Officer (conflictofinterest@pearson.com). All records are required to be available for audit purposes.

All Pearson staff

- Everyone is responsible for making sure that they are familiar with this policy, any guidelines and complete any mandatory conflict of interest training.
- Every year all staff must read the policy and confirm that they understand it.
- An important feature of the policy is the requirement that an individual disclose any activity that might create a potential conflict of interest. If there is any doubt whether or not it represents a conflict of interest it should be reported.
- The individual and line manager are both responsible for documenting the issue carefully.
- An individual may want to raise concerns relating to conflict of interest directly with the Responsible Officer. This can be done in confidence and they are entitled to receive a response to their concerns.
- Any staff member considering paid or unpaid work outside Pearson should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the conflict of interest inbox if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with Pearson's activities.
- Before each exam series all staff and other individuals, non-Executive Members of the Board and Members of the Pearson Board must declare if any candidates being entered for our exams and other assessments, are family members, other relatives or friends. This should be declared by completing a Declaration of Interest Form, or by emailing declarations@pearson.com

Pearson's Responsible Officer: monitoring and escalation

- The Responsible Officer is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the Board and the regulatory authorities.
- The Business Improvement and Regulation Department will investigate any issues identified by the Responsible Officer within 24 hours and will publish a preliminary report within 5 working days.

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5. Advice and guidance

5.1 For further advice and guidance please contact the office of the Responsible Officer (conflictofinterest@pearson.com)

6. Feedback and complaints

6.1 We welcome your feedback, which helps us to improve the products and services we provide. We know that sometimes things go wrong, but if they do, we want to try to stop them from happening again. If you'd like to give us your feedback or you're unhappy with the service you can email us using our online form.

7. Regulatory references

7.1 UK regulators require all awarding organisations to establish and maintain their compliance with regulatory conditions and criteria. As part of this process, policies that relate to Pearson's status as an awarding organisation will reference any particular conditions and criteria that they address.

7.2 This policy addresses the following regulatory criteria and conditions:

Ofqual/CCEA Regulation/Qualifications Wales General Conditions of Recognition	
Conflict of Interest	A4
SQA Accreditation Regulatory Principles (2014)	
The awarding body shall have clearly defined and effective governance arrangements.	Principle 1
Conditions for organisations on the register of end-point assessment organisations	
Conflict and Collusion	Criteria 33-43

8. Review date

8.1 January 2019

9. Useful links

9.1 All the following policies are available at http://qualifications.pearson.com/policies

- Examiners as authors policy
- Endorsed resources for Pearson qualifications policy
- Pearson Training for Regulated Qualifications Events Policy

9.2 A separate AA conflict of interest policy is available for our assessment associates via the Associate Management department.

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Other useful documents

- JCQ *Public Interest Disclosure Act (Whistleblowing)*
- JCQ Agreed Code of Practice on Awarding Body/Publisher Relationships
- Conditions for organisations on the register of end-point assessment organisations

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