

Greenway Academy

Conflict of Interest Policy

Version Number:	1.0
Description	This policy explains how Greenway Academy identifies, declares, manages, and monitors conflicts of interest to ensure fairness, transparency, and integrity across all academic and operational activities.
Target Audience	This policy applies to all employees, tutors, assessors, Internal Quality Assurers (IQAs), contractors, consultants, directors, and any other individuals associated with Greenway Academy.
Author	Greenway Academy

1. Introduction

Greenway Academy is committed to ensuring that all decisions relating to teaching, assessment, quality assurance, and learner support are made fairly, objectively, and without improper influence. To maintain the credibility of our qualifications and the confidence of learners and awarding organisations, all individuals involved in the delivery and assessment of OTHM qualifications must declare any actual, potential, or perceived conflicts of interest.

This policy provides guidance on recognising conflicts of interest and outlines the procedures for declaring and managing them effectively.

2. What is a Conflict of Interest?

A conflict of interest occurs when an individual's personal, financial, or professional interests could affect, or appear to affect, their ability to perform their duties impartially.

Such situations may influence decision-making and compromise the fairness and integrity of Greenway Academy's assessment and quality assurance processes if they are not appropriately managed.

3. Examples of Conflicts of Interest

Conflicts of interest may arise in a variety of situations, including but not limited to:

- Holding a position or employment with another education provider or organisation that could influence decisions made at Greenway Academy.
- A director, owner, or senior manager being directly involved in assessing or internally verifying learners' work where independence cannot be maintained.
- Having access to confidential assessment materials while also teaching, coaching, or preparing learners for the same assessment.
- Assessing or verifying the work of family members, close friends, or individuals with whom there is a personal relationship.
- Receiving gifts, financial benefits, or incentives that could affect professional judgement.

These examples are not exhaustive, and individuals are expected to disclose any situation that may reasonably be considered a conflict of interest.

4. Policy Statement

Greenway Academy is dedicated to protecting the integrity of its qualifications, assessment decisions, and quality assurance systems. All staff and associates are expected to act honestly, professionally, and transparently at all times.

Any conflict of interest must be declared promptly so that appropriate steps can be taken to minimise any potential risk to learners, the Academy, and the awarding organisation.

5. Declaring a Conflict of Interest

To ensure transparency, Greenway Academy requires that:

- All tutors, assessors, Internal Quality Assurers, and relevant staff complete a Conflict of Interest Declaration before commencing their duties.
- A declaration must be completed regardless of whether the individual has any conflicts to report.
- Conflict declarations are reviewed and renewed annually.
- Any changes to an individual's circumstances must be reported immediately to their line manager or the designated Quality Assurance Manager.
- All declarations are securely recorded and maintained by the Academy.

6. Managing Conflicts of Interest

Greenway Academy recognises that not every conflict can be predicted in advance. Whenever an actual or potential conflict is identified, it will be reviewed to determine the most appropriate action.

Depending on the circumstances, Greenway Academy may:

- Reassign assessment or verification responsibilities.
- Appoint an independent assessor or Internal Quality Assurer.
- Restrict access to confidential information.
- Increase oversight of academic decisions.
- Record the conflict and the action taken to manage it.

All actions taken will be documented to ensure transparency and accountability.

7. Roles and Responsibilities

Board of Directors

The Board of Directors is responsible for:

- Approving and overseeing the implementation of this policy.
- Ensuring the policy remains effective and compliant with awarding organisation requirements.
- Promoting a culture of integrity and ethical decision-making throughout the Academy.

Employees and Associates

Every employee, contractor, tutor, assessor, Internal Quality Assurer, and consultant is responsible for:

- Reading and complying with this policy.
- Declaring any actual, potential, or perceived conflicts of interest.
- Updating their declaration whenever their circumstances change.
- Cooperating fully with any measures introduced to manage identified conflicts.

Managers

Managers are responsible for:

- Ensuring staff understand and comply with this policy.
- Collecting and maintaining conflict of interest declarations.
- Reviewing reported conflicts and implementing appropriate control measures.
- Keeping written records of all declared conflicts and the actions taken to manage them.
- Supporting internal and external quality assurance processes relating to conflicts of interest.

Greenway Academy supports the professional development of its staff and recognises that employees may study OTHM qualifications themselves. Appropriate arrangements will be implemented to ensure that such participation does not compromise assessment integrity or quality assurance.

8. Monitoring and Review

Greenway Academy will review this policy annually, or sooner where required by changes in legislation, regulatory guidance, or awarding organisation requirements.

Regular monitoring will ensure that the policy remains effective, reflects current best practice, and continues to support the fair management of conflicts of interest across the Academy.