

# **Param Qualifications Conflict of Interest Policy**

## Contents

1. Introduction .....	3
1.1 Who and What this Policy is For .....	3
1.2 Identifying Conflicts of Interest: .....	3
1.3 Managing Conflicts of Interest:.....	4
1.4 The written conflict of interest policy: .....	4
2. Definition of Conflicts of Interest .....	4
3. Associated Entities .....	5
4. Board-Level Conflicts of Interest – Examples & Controls .....	5
5. Declaring Conflicts of Interest.....	6
6. Monitoring Conflict of Interests.....	6
7. Managing Conflicts of Interest.....	8
8. Centre-Level Conflict of Interest Scenarios.....	8
9. Conflict of Interest Identification, Management and Mitigation Framework.....	8
10. Escalation Procedures.....	9
11. Evidence and Record-Keeping Requirements.....	10
12. Managing Conflict of Interest with Contractors & Suppliers .....	11
13. Annual Conflict of Interest Assurance Review.....	11
14. Confidentiality .....	12
15. Reporting to Relevant Authorities (if applicable) .....	12
16. Retention of Records .....	12
17. Contact Information.....	112

## **1. Introduction**

Param Qualifications is committed to maintaining the highest standards of integrity, impartiality, and transparency in all its activities. Conflicts of interest, if not properly identified and managed, can undermine confidence in decision-making and organisational governance.

This policy sets out how actual, potential, and perceived conflicts of interest are identified, declared, recorded, and managed to ensure decisions are made fairly and without undue influence. This policy forms part of Param Qualifications' wider governance and risk management framework.

### **1.1 Who and What this Policy is For**

- This policy applies to all individuals involved in the activities of Param Qualifications, including staff, assessment associates, contractors, and any other persons acting on behalf of the organisation.
- All such individuals are expected to be aware of the potential for conflicts of interest and to understand their responsibility to identify, declare, and report any actual or potential conflicts in a timely manner.
- This policy provides clear guidance on what constitutes a conflict of interest, why such conflicts must be appropriately managed, and how Param Qualifications identifies, records, and manages conflicts to protect the integrity of its activities.
- The publication and implementation of this policy support Param Qualifications in maintaining effective governance arrangements and aligning with applicable regulatory expectations.

### **1.2 Identifying Conflicts of Interest:**

Ofqual requires that Awarding Organisation have policies and structures in place which identifies Conflict of interest as set out below.

A4.1 An awarding organisation must identify and monitor –  
(a) all Conflicts of Interest which relate to it, and

(b) any scenario in which it is reasonably foreseeable that any such Conflict of Interest will arise in the future.

A4.2 An awarding organisation must establish and maintain an up to date record of all Conflicts of Interest which relate to it.

### **1.3 Managing Conflicts of Interest:**

Ofqual requires an awarding organisation to ensure robust procedures are in place for managing conflict of interest as set out below.

A4.3 An awarding organisation must take all reasonable steps to ensure that no Conflict of Interest which relates to it has an Adverse Effect.

A4.4 Where such a Conflict of Interest has had an Adverse Effect, the awarding organisation must take all reasonable steps to mitigate the Adverse Effect as far as possible and correct it.

### **1.4 The written conflict of interest policy:**

Ofqual requires that an awarding organisation must have in place a written conflict of interest policy as such as below.

A4.7 An awarding organisation must establish, maintain, and at all times comply with an up to date written conflict of interest policy, which must include procedures on how the awarding organisation intends to comply with the requirements of this condition.

A4.8 When requested to do so by Ofqual in writing, an awarding organisation must promptly submit to Ofqual its conflict of interest policy, and must subsequently ensure that the policy complies with any requirements which Ofqual has communicated to it in writing.

## **2. Definition of Conflicts of Interest**

A conflict of interest arises where an individual's personal, financial, or professional interests could, or could reasonably be perceived to, influence their judgement or actions in a way that conflicts with the objectives or integrity of Param Qualifications.

Conflicts may be:

- **Actual** – currently influencing a decision or activity
- **Potential** – may arise in the future

- **Perceived** – could reasonably be viewed by others as influencing judgement

Examples include, but are not limited to:

- Marking, reviewing, or overseeing work involving a person with whom there is a personal or professional relationship
- Participating in decisions where a financial interest exists
- Holding external roles or consultancy positions that may compromise impartiality

### **3. Associated Entities**

Param Qualifications recognises that senior personnel may hold interests in associated or related training or consultancy organisations.

The Director maintains financial interests in associated training entities, including RedHat Safety Training & Consulting Pvt Ltd and Myaokay Tutelage LLC / Pvt Ltd. These entities are subject to the same approval, monitoring, and fee arrangements as any other organisation. The Director will not participate in any decisions relating to these entities, and all related matters will be independently reviewed and recorded in the Conflict of Interest Register.

To maintain independence and transparency:

- Associated entities are subject to the same approval, monitoring, and fee arrangements as any other organisation
- Individuals with a declared interest will not participate in decisions affecting those entities
- Decisions involving associated entities are subject to independent review
- All related interests, actions, and decisions are recorded in the Conflict of Interest Register

These arrangements ensure that no preferential treatment is given and that impartiality is maintained at all times.

### **4. Board-Level Conflicts of Interest – Examples & Controls**

Conflicts at board or senior management level may arise where:

- A Board member has ownership or financial interests in an organisation interacting with Param Qualifications

- A Board member has previously worked with or supervised individuals whose work may be reviewed
- A close family member is employed by an organisation seeking approval or oversight
- A Board member holds advisory or governance roles in another organisation with overlapping activities

Controls include:

- Mandatory declaration of interests
- Recusal from discussions and decision-making
- Independent review of affected decisions
- Formal recording in governance minutes and the Conflict of Interest Register

## 5. Declaring Conflicts of Interest

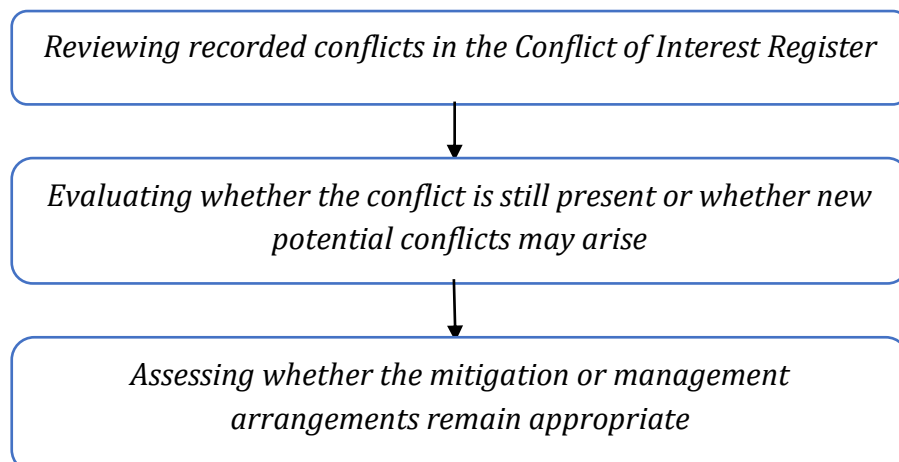
All directors, staff, contractors, and stakeholders are required to:

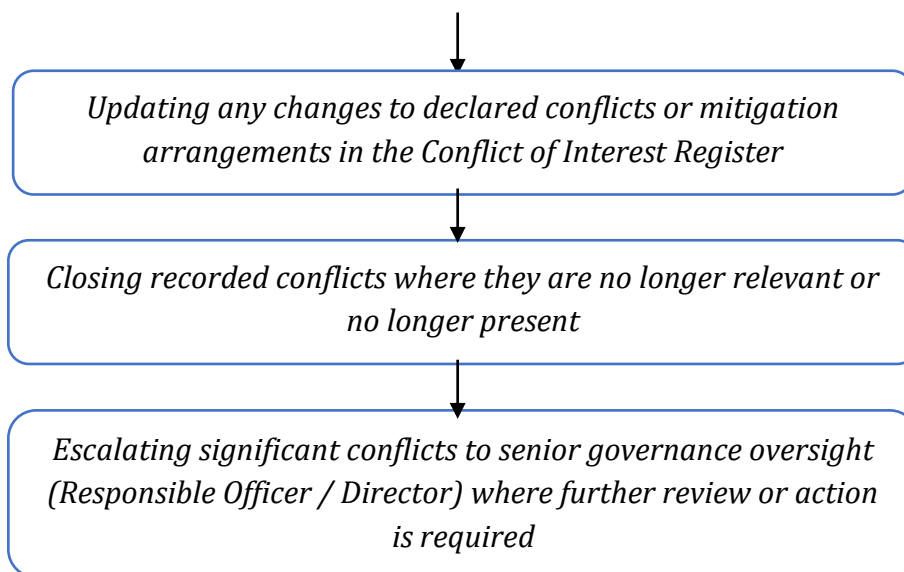
- Declare conflicts of interest at induction
- Complete an annual Conflict of Interest Declaration
- Declare new conflicts immediately if circumstances change
- Declare relevant interests before meetings or decision-making activities

Where there is uncertainty, individuals must seek guidance from their line manager or designated governance lead.

All declarations are recorded centrally to ensure transparency and auditability.

## 6. Monitoring Conflict of Interests





## 7. Managing Conflicts of Interest

When a conflict of interest is identified, Param Qualifications will take proportionate steps to ensure it does not influence outcomes. These may include:

- Excluding the conflicted individual from the activity or decision
- Reassigning responsibilities to a conflict-free individual
- Applying enhanced monitoring or review
- Appointing an independent internal or external reviewer

The Conflict of Interest Register is reviewed periodically as part of governance oversight.

## 8. Centre-Level Conflict of Interest Scenarios

Examples of centre-related conflicts include:

- Pressure on staff to influence outcomes for financial or reputational benefit
- Trainers assessing their own learners without independent oversight
- Financial incentives linked to outcomes
- Attempts to influence monitoring or review decisions
- Individuals working across multiple organisations with overlapping responsibilities

These risks are addressed through approval checks, monitoring activities, and independent review processes.

## 9. Conflict of Interest Identification, Management and Mitigation Framework

Param Qualifications applies a structured framework to ensure conflicts of interest are identified early, managed appropriately, and mitigated effectively so that impartiality is maintained across all activities. The framework operates on a proportional basis, depending on the nature and severity of the risk.

### Identification

Conflicts of interest may be identified through a range of routine governance and operational activities, including:

- Completion of Conflict of Interest Declaration Forms

- Declarations made during governance or management meetings
- Approval, monitoring, and review activities
- Review of outcome data and trends
- Background, organisational, or relationship checks

### **Management**

Once a conflict is identified, immediate steps are taken to ensure it does not influence decisions. This normally includes:

- Removing the individual from the relevant activity or decision
- Reassigning responsibilities to a conflict-free individual
- Applying additional scrutiny or review where appropriate
- Recording the conflict and actions taken in the Conflict of Interest Register

### **Mitigation**

Where ongoing risks exist, further mitigation measures may be applied to protect integrity, such as:

- Reallocation of roles or responsibilities
- Appointment of an independent internal or external reviewer
- Temporary restrictions on specific activities
- Additional training or guidance on impartiality
- Increased oversight until the risk is resolved

## **10. Escalation Procedures**

Param Qualifications applies a clear escalation process to ensure that conflicts of interest are addressed at the appropriate level and in a timely manner. The level of escalation depends on the nature, seriousness, and potential impact of the conflict, with the aim of protecting impartiality and maintaining confidence in organisational decision-making.

Escalation may occur at one or more of the following levels:

- **Level 1 – Operational**

Minor or routine conflicts are managed at an operational level through reassignment of responsibilities and updating of the Conflict of Interest Register.

- **Level 2 – Governance**

More significant conflicts are escalated to senior management or governance leads to ensure independence and appropriate oversight of decisions.

- **Level 3 – Independent Oversight**

Where internal independence cannot be assured, an independent internal or external advisor may be engaged to review the matter and confirm the appropriateness of actions taken.

- **Level 4 – External Notification (if applicable)**

In exceptional circumstances, and where required by law, contract, or formal agreement, the matter may be reported to a relevant external authority.

All escalation decisions and outcomes are formally documented and retained as part of the organisation’s governance records.

## **11. Evidence and Record-Keeping Requirements**

To demonstrate transparency and accountability, Param Qualifications maintains a clear and auditable record of all declared conflicts of interest and the actions taken to manage them. Accurate record-keeping supports effective governance and enables periodic review.

Records maintained include:

- A central Conflict of Interest Register
- Individual declaration forms
- Relevant governance and management meeting minutes
- Documentation of mitigation actions and review decisions

Each record clearly captures key information, including:

- The individual declaring the interest
- The nature and type of the conflict
- The management or mitigation actions applied
- The person responsible for review and approval
- The date of review and next review date

## **12. Managing Conflict of Interest with Contractors & Suppliers**

For the purposes of this policy, a conflict of interest is defined as a conflict between the official responsibilities of a Contractor when performing activities for Param Qualifications and any other interests which the Contractor may have that could compromise, or appear to compromise, their decisions and/or actions when performing Param Qualifications activities.

Examples of conflicts of interest It is not possible to provide a definitive list of examples of conflicts of interest, but the following are examples of situations that could lead to actual or perceived conflicts of interest, that we would expect to be declared by contractors: Working with a business outside Param Qualifications which performs similar functions to Param Qualifications.

Undertaking assessment, end-point-assessment, approval or quality assurance activities for an organisation (including centres) of which a Contractor is a member of staff, governor, trustee or has some other official status; or with which the Contractor has (or has had) involvement as a consultant or adviser.

Participating in the appointment, promotion, supervision or evaluation of a person who works for a business which performs similar functions to Param Qualifications and with whom the Contractor has close or familial ties.

Having a close or familial relationship with someone registered for a Param Qualifications qualification and/or assessment; or their family and being involved in decisions about the outcome of the learner/apprentice's qualification and/or assessment.

Taking part in any Param Qualifications decision involving a business that employs a person with whom the Contractor has close or familial relationship.

Organisations from a consortium in partnership with Param Qualifications colluding to assess each other's apprentices and/or to circumvent the requirement for independent assessment

## **13. Annual Conflict of Interest Assurance Review**

Param Qualifications undertakes an annual assurance review to confirm that conflicts of interest have been effectively identified, managed, and mitigated throughout the year. This review forms part of the organisation's ongoing governance and continuous improvement arrangements.

The annual review will:

- Summarise all declared conflicts of interest
- Evaluate the effectiveness of mitigation actions taken
- Identify any emerging or recurring risks
- Highlight trends or areas for improvement

The outcomes of the review are formally documented and retained as governance evidence, with any required actions incorporated into future planning and oversight activities.

## **14. Confidentiality**

All conflict-related information is treated confidentially and accessed only by authorised personnel. Individuals with a declared interest must not investigate or manage matters in which they are conflicted.

## **15. Reporting to Relevant Authorities (if applicable)**

Where conflicts present a serious risk to integrity, or where required by law, contract, or formal agreement, matters may be reported to the appropriate external authority.

## **16. Retention of Records**


Conflict of interest records are retained in line with the organisation's Records Retention Policy and are available for audit or review when required.

## **17. Contact Information**

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