



ESTAR

ELITE SKILLS, TRAINING
& RECRUITMENT

CP-003

**Conflicts of Interest
Policy and Procedure**

REV: 00



Conflicts of Interest Policy and Procedure

Form: CP-003

Revision: 00

Policy owner: Head of Quality & Compliance

Operational leads: Senior Leadership Team (SLT), Programme Managers, Finance & Governance Lead

Applies to: All staff, governors/directors, associates, subcontractors, assessors, IQAs, EPA-related roles, and decision-makers

Provision: Funded and non-funded delivery (including apprenticeships and adult skills)

Review cycle: Annual (or earlier if regulatory or organisational changes occur)

Version: 00

1. Purpose

ESTAR Education is committed to operating with **integrity, transparency and impartiality**. This policy sets out how ESTAR identifies, declares, manages and monitors **actual, potential and perceived conflicts of interest** to ensure that decisions relating to learners, assessment, funding, procurement and governance are fair, objective and compliant.

This policy supports confidence in:

- assessment and internal quality assurance decisions;
- employer and partner relationships;
- funding and financial probity; and
- governance and senior leadership oversight.

2. Scope

This policy applies to conflicts of interest that may arise in relation to:

- recruitment, enrolment, assessment and certification;
- internal verification, standardisation and quality assurance;
- End-Point Assessment support activities (where ESTAR is not the EPAO);
- procurement, subcontracting and supplier selection;
- financial decisions, funding claims and incentives;
- governance, leadership and strategic decision-making.

3. Definition of a conflict of interest

A **conflict of interest** occurs where an individual's personal, professional or financial interests **could improperly influence**, or be perceived to influence, their judgement or actions while carrying out duties for ESTAR.

Conflicts may be:

- **Actual** – a real conflict exists now;
- **Potential** – a conflict could arise in the future; or
- **Perceived** – a reasonable external party could believe a conflict exists, even if it does not.

4. Examples of conflicts of interest

Conflicts may include, but are not limited to:

- assessing, verifying or making decisions about a learner who is a family member, close friend or business associate;
- financial interest in a supplier, employer or subcontractor used by ESTAR;
- secondary employment or consultancy that overlaps with ESTAR delivery or competitors;
- personal relationships influencing recruitment, progression, disciplinary or assessment outcomes;
- ownership, directorship or shareholding in organisations that may benefit from ESTAR decisions;
- incentives or gifts that could influence impartial judgement.

5. Principles

ESTAR will ensure that:

- conflicts are **declared early and openly**;
- decisions remain **fair, impartial and evidence-based**;
- conflicts are **managed, mitigated or removed** appropriately;
- records are **accurate, auditable and current**; and
- no individual is disadvantaged for declaring a conflict in good faith.

6. Responsibilities

6.1 All staff and associates

- Declare any actual, potential or perceived conflict of interest immediately.
- Complete a **Conflict of Interest Declaration** on appointment and annually thereafter.
- Update declarations whenever circumstances change.
- Comply with agreed mitigation measures.

6.2 Programme Managers / Line Managers

- Review declarations relevant to their area.

- Implement mitigation actions (e.g. reallocation of duties).
- Monitor ongoing compliance.

6.3 Head of Quality & Compliance

- Maintains the **Conflicts of Interest Register**.
- Determines appropriate management actions.
- Ensures conflicts do not compromise assessment, QA or learner outcomes.
- Reports material conflicts to senior leadership and governance.

6.4 Senior Leadership / Directors

- Declare interests annually and at point of decision-making.
- Ensure organisational decisions are free from undue influence.
- Provide oversight and assurance on high-risk conflicts.

7. Declaration process

7.1 Initial declaration

All relevant individuals must:

- complete a **Conflict of Interest Declaration Form** on appointment/engagement; and
- confirm understanding of this policy.

7.2 Ongoing declaration

Declarations must be updated:

- annually; and
- immediately if a new conflict arises.

Declarations are submitted to the Head of Quality & Compliance and recorded in the central register.

8. Managing conflicts of interest

Where a conflict is identified, ESTAR will take proportionate action, which may include:

- removal of the individual from the decision-making process;
- reallocation of assessment, verification or review duties;
- additional internal quality assurance or independent oversight;
- restriction of access to sensitive information;



- withdrawal from procurement or contractual decisions.

The chosen action will be:

- documented clearly;
- reviewed for effectiveness; and
- proportionate to the level of risk.

9. Assessment and quality assurance safeguards

To protect assessment integrity:

- assessors must not assess learners where a conflict exists;
- IQAs must not sample or verify their own work or that of close associates;
- EPA-related support must remain neutral and compliant with EPAO rules;
- alternative staff or independent sampling will be used where required.

10. Gifts, hospitality and incentives

ESTAR staff and associates must:

- not accept gifts, hospitality or incentives that could influence, or appear to influence, professional judgement;
- declare any gifts or hospitality above a nominal value to the Head of Quality & Compliance.

Gifts or hospitality that compromise impartiality must be declined.

11. Failure to declare a conflict

Failure to declare a conflict of interest may result in:

- removal from duties;
- disciplinary action (for employees);
- termination of contract (for associates/subcontractors);
- investigation under the *Malpractice and Maladministration Policy*.

12. Record keeping and audit

ESTAR maintains:

- a **Conflicts of Interest Register**;



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- individual declaration forms; and
- records of mitigation actions and reviews.

These records are reviewed as part of:

- internal quality assurance;
- management review; and
- external audit or inspection activity.

13. Confidentiality and data protection

Declarations are handled confidentially and in line with data protection requirements. Information is shared only where necessary to manage the conflict effectively.

14. Policy review

This policy is reviewed:

- annually; and
- following changes to funding rules, inspection frameworks, organisational structure or governance arrangements.

Date of last Review	Print Name	Position
02/02/2026	Keiran Casey	Chief Executive Officer
	Darren Beach	Quality Manager

