The Qualification Hub

Policy, Procedures and Documents

Conflicts of Interest Policy and Log of Possible Conflicts of Interest

Version	Review Date	Reviewed By
1.0	January 2026	TQH Board of Directors

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Introduction

The document outlines both The Qualification Hub's (TQH):

- broad approach to identifying, managing, monitoring, and reviewing actual and potential conflicts of interest which may affect TQH, both now and in the foreseeable future;

and

- the actual and potential conflicts of interest identified to date together with the arrangements in place to prevent, manage, mitigate, or monitor those conflicts.

It may, from time to time, be provided to the regulators upon request to satisfy them of our ability to comply with their requirements in relation to conflicts of interest and to prevent such conflict becoming 'Adverse Effects' (as defined by the regulators).

Review arrangements

TQH Board of Directors (Board) and Senior Leadership team review this document at least annually as part of TQH's self-evaluation and governance review arrangements. However, a review will be commissioned earlier should an issue arise in relation to an actual or potential conflict of interest and/or in response to customer, learner, or regulatory feedback.

Definition of a conflict of interest

For the purposes of this policy, we have adopted the definition used by the regulatory authorities in relation to conflict of interests. In essence, a conflict of interest exists in relation to our Awarding Organisation where:

a) Its interests in any activity undertaken by it, on its behalf, or by a member of its Group have the potential to lead it to act contrary to its interests in the development, delivery, and award of qualifications in accordance with its Conditions of Recognition

b) A person who is connected to the development, delivery or award of our qualifications has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award of qualifications and which may impact our compliance with the requirements of the regulator's Conditions of Recognition

c) An informed and reasonable observer would conclude that either of these situations was the case.

Conflicts of interest can arise in a variety of contexts. The Conditions cover conflicts of interest that affect (or could affect) an awarding organisation's ability to develop, deliver and award regulated qualifications in a way that complies with its Conditions of Recognition.

For clarity, the three parts (above) of this definition are interrelated:

- The first covers conflicts of interest that relate to TQH itself. This includes situations where activities carried out by TQH, on its behalf, or by a related organisation may impair TQH's ability to make objective, impartial, and evidence-based decisions regarding the development, delivery, assessment, quality assurance, or award of qualifications.

- Whereas similarly, the second covers conflicts of interest that relate to the individuals we use (full-time staff, contractors, suppliers, advisors, etc) in any part of the development, delivery, or award of its qualifications. That is, situations where a particular individual's interests might impair their ability to make the objective and impartial decisions that are necessary to ensure we can develop, deliver, and award our qualifications in line with the Conditions.

- The last point simply extends the definition to both areas to include situations where an observer would perceive that TQH or an individual has such a competing interest.

Condition A4.3 requires us to take all reasonable steps to ensure that no conflict of interest that relates to it has an Adverse Effect. Reasonable steps are likely to include the following:

a) Adhering to relevant requirements, and having regard to relevant guidance

b) Ensuring insofar as possible that, where a conflict of interest cannot be avoided, each assessment remains fit for purpose within the meaning given to that term in Condition D1.2. In particular, each assessment should remain valid.

c) Managing organisational conflicts of interest, as well as those at an individual level.

d) Ensuring that processes and procedures in relation to the delivery of the qualifications are sufficiently separate from assessment, and that assessment processes and procedures are sufficiently separate from each other, so as to minimise the risk of any conflict of interest having an Adverse Effect.

Examples provided by the regulators relating to possible conflicts of interest are referenced within Condition A4 (Conflicts of Interest) within the relevant Conditions Log maintained within the Governance Module of The Hub.

Conflict of interest principles

The regulators' requirements do not prohibit organisations from operating where conflicts of interest exist. Instead, they require awarding organisations to identify, monitor, manage, and where possible mitigate conflicts of interest in order to prevent any Adverse Effect arising from them and to minimise any Adverse Effect should one nonetheless occur.

Therefore, in implementing our approach to identifying and managing actual/potential conflicts of interest staff are required to abide by the following principles:

- All managers and staff must understand and commit to identifying and managing all actual/potential conflicts of interest that may affect The Qualification Hub and in doing so raise possible conflicts of interest with The Head of Operations.
- Staff must be proactive in the identification and management of conflicts of interest that may affect our effectiveness, level of regulatory compliance and/or reputation.
- Staff must be open and transparent regarding the nature of any actual or potential conflicts of interest and must not seek to conceal, minimise, or misrepresent them. Managing conflicts of interest is intended to prevent issues arising which may adversely affect operational effectiveness, regulatory compliance, qualification integrity, or public confidence.
- Staff should seek to identify and address conflicts of interest as early as possible.
- Our controls for managing any potential conflicts of interest must be proportionate to the risks associated with the identified conflict(s)

The key principle underpinning this policy is that where there is uncertainty, actual or potential conflicts of interest should be declared, recorded, reviewed, and appropriately managed. Staff should therefore log any possible conflicts of interest together with the steps taken, or proposed, to prevent, manage, mitigate, or monitor the associated risks and minimise the likelihood of an Adverse Effect occurring.

Overview

As an organisation that keeps all aspects of its business under review, individual teams are expected to identify and inform the Head of Operations of any actual/potential conflicts of interest that could impact TQH's regulatory compliance, operational effectiveness, qualification integrity, or reputation, and which are not already identified in the table at the end of this policy.

In addition, each member of The Senior Leadership Team (SLT) is required to manage and monitor any identified conflicts of interest that relate to their area of operations (as outlined in the table at the end of this document). Should the status of any identified conflict or the associated controls change, then the SLT should inform the CEO so they can update, as required, the details in the table below.

Overall compliance with this policy, together with the effectiveness of TQH’s conflict identification, monitoring, management, and mitigation arrangements, will be reviewed regularly by the Senior Leadership Team (SLT) and the Board of Directors. The associated conflicts of interest log and related governance records will be maintained within The Hub.

Conflicts of Interest Log

Add a conflict of interest scenario | Governance areas

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Item Ref	Conflict Title	Type	Liklihood	Impact	Conflict Rating	Trend	Review date	Staff member (if relevant)	Conflict owner	Centre conflict?	Linked items	Status	Date last modified	Last modified by	
C00001	Conflict of interest policy	Contractor/part-time staff; Supplier	MEDIUM	HIGH	AMBER			Amiee Saul Organisational Advisor	Rose Creatio SM, cam m, Amiee Saul Organisational Advisor		3	open	18/02/2021 10:14:29	Creatio - AO User	details
C00002	Staff member X	Staff	HIGH	HIGH	AMBER-RED	NEW			Alan Long		1	open	14/08/2019 12:04:54	Creatio - AO User	details

Details of all identified actual and potential conflicts of interest, together with the associated controls, mitigation arrangements, monitoring activity, and overall risk ratings relating to likelihood and impact, are maintained within the Conflicts of Interest Log in the Governance Module of The Hub.

The Log contains details of all active conflicts of interest together with closed records, associated actions, governance decisions, mitigation measures, monitoring activity, and a full audit trail and history of each record.

Dealing with conflicts of interest and/or breaches to the procedures outlined in this policy

Should any member of the Senior Leadership Team identify a possible breach of this policy, or where an unforeseen actual or potential conflict of interest emerges, the CEO must be informed as soon as reasonably practicable and an appropriate investigation and review of the associated arrangements, controls, and procedures will be undertaken.

Should an external party believe that an actual or potential conflict of interest involving TQH has arisen, they should raise the matter with the Head of Operations, who will review the concern and initiate appropriate investigation, escalation, and governance arrangements in accordance with TQH procedures and the associated governance records maintained within The Hub.

3rd Party Management

Add a 3rd party records | Governance areas

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Item Ref	Name of organisation/individual	Type	Work brief/role	Performance	Trend	Extend?	Start date	Date of last performance review	Contract end date	Contract review date	Contract/Line manager	Linked items	Status	Date last modified	
P00001	Hazel Brown	Consultant	To assist with the development of Qualifications	MEETS EXPECTATIONS		ON TRACK TO EXTEND	01/10/2018	01/10/2019	01/10/2019	01/10/2019		6	open	09/09/2020 14:47:42	details
P00002	Edmond Bramhallgd	IT supplier	Test	NO VIEW AT PRESENT		ON TRACK TO EXTEND	29/01/2020	29/01/2020	29/01/2020	29/01/2020		0	open	11/02/2021 10:16:28	details

The Head of Operations (or the CEO, where the Head of Operations is involved in the matter) will lead on the investigation and will ensure that any personnel involved in the investigation do not have any personal involvement, conflict of interest, or prior involvement in the matter being reviewed.

Details of the incident, investigation findings, actions taken, and any revised or additional controls will be recorded within the relevant record in the Conflicts of Interest Log within The Hub. Where records are updated or new records are created within The Hub, the system will automatically notify relevant members of the Senior Leadership Team (SLT) in accordance with the associated governance and escalation arrangements.

Where the breach is also classified as an Adverse Effect, the Responsible Officer must promptly inform Ofqual in accordance with TQH's Adverse Effects procedures as outlined within the Governance Manual. In doing so, the Responsible Officer will provide details of the reasonable steps taken, or intended to be taken, to prevent, correct, manage, or mitigate the Adverse Effect together with details of any associated investigation, review activity, corrective actions, or governance arrangements. For information, Ofqual defines an Adverse Effect as where an act, omission, event, incident, or circumstance has an Adverse Effect if it:

(A) gives rise to prejudice to Learners or potential Learners; or

(B) adversely affects:

(i) the ability of the awarding organisation to undertake the development, delivery or award of qualifications in accordance with its Conditions of Recognition;

(ii) the standards of qualifications which the awarding organisation makes available or proposes to make available; or

(iii) public confidence in qualifications.

Recording of conflicts of interest

Within The Hub, depending on the individual, supplier, centre, or activity involved, a full audit trail is maintained in relation to each conflict of interest record, including details of the actual or potential conflict of interest, associated controls, mitigation arrangements, monitoring activity, actions taken, governance decisions, and the rationale for any closure or removal of the record. Conflicts of interest are recorded in the following places:

- Conflicts of Interest Log – records all organisational and operational conflicts of interest (eg with suppliers, external companies etc) and staff – including Board members and some contracted staff (eg consultants).

- 3rd Party Log – records details of third parties used by TQH and, where relevant, links to associated conflicts of interest records, centre records, governance records, or associated monitoring activity within The Hub.
- Quality assurance staff profile (e.g. EQA) - any conflicts of interest are logged on their profile in relation to our customers and The Hub highlights these during allocation and operational review processes. It is possible that some staff may also have additional conflicts of interest recorded in the overall Conflicts of Interest Log if they carry out other roles for our organisation.
- Centre profile on the Intelligence Tab and/or associated profiling tools – records the types of actual or potential conflicts of interest which the centre and/or its staff, suppliers, or partners may have together with associated controls, mitigation arrangements, monitoring activity, and risk management arrangements.

Reporting on our arrangements

Due to the potential for actual and potential conflicts of interest arising within TQH's activities and operations, both Senior Leadership Team (SLT) and Board meetings will include a standing agenda item relating to conflicts of interest, associated governance arrangements, mitigation activity, emerging risks, and any significant issues or incidents.

The Senior Leadership Team (SLT) and Board will have access to and may review the Conflicts of Interest Log and associated governance records within The Hub as part of their governance, oversight, monitoring, and assurance arrangements.

Contact

If you have any queries regarding the contents of this policy, please contact the CEO or email lois@thequalificationhub.com.

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
Members of the Board and Senior Leadership Team may unduly influence decisions so as to ensure a personal or commercial material benefit (e.g. in relation to interests they may have which are external to The Qualification Hub).	Senior Leadership Team (SLT) members, Board members, and other relevant personnel are required to declare any potential conflicts of interest at their interview and appointment stage and if circumstances change once they begin to work for us. In addition, we will undertake an annual check with each staff member or Board member to proactively check and identify potential and/or actual conflicts of interest that may have emerged in the interim period (e.g. ask them to re-sign the declaration statement). All staff and members in attendance at our meetings will be required to declare at the beginning of a meeting any private interest which they have in an item to be discussed and certainly before any discussion of the item. This 'declaration of possible conflicts of interest' will be a standard item on all agendas. In doing so that member will abstain from any vote/decision that may pose a conflict of interest – especially where they may directly or	Head of Quality Assurance	CEO	Board of Directors

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	indirectly receive a material benefit from the decision and/or has a conflict of loyalty (eg their overriding duty is to act in the best interests of the other party). They may be allowed to engage in the discussion if the other members do not object and/or the possible conflict is already known to the rest of the members/attendees. Agenda items that are confidential and would cause a conflict of interest if raised in front of all members of the meeting (e.g. SLT) may be discussed through separate meetings or discussions with the member deemed to have a conflict excluded from the discussions and review activity. All decisions under a conflict of interest will be recorded and reported in the minutes of the meeting with details of: ▪ the nature and extent of the conflict; ▪ an outline of the discussion; ▪ the actions taken to manage the conflict.			

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	Access to documentation that is deemed confidential and/or may lead to a possible conflict of interest are restricted in their circulation before and after the meetings. Also, where a group has a member who also works for a centre (e.g. college) we will ensure that any reports/issues presented to the group that relate to specific centres will be anonymous in that they will have centre names removed/redacted.			
Investigations into actual or potential conflicts of interest involving direct or indirect representatives of TQH will not be carried out by individuals who may have a vested interest in the outcome.	We will ensure that all reported actual or potential conflicts of interest, allegations, or related concerns are reviewed by the CEO, who will be responsible for assigning an appropriate member of staff to lead or support the investigation. The Governance Manual, Qualification Delivery arrangements, and associated policies and procedures contain details of the personnel who may lead or support investigations relating to different areas of TQH's operations. At all times, the person responsible for overseeing the investigation will ensure that the personnel assigned to the investigation have the appropriate level of training and competence and have had no previous	Head of Quality Assurance	CEO	Board of Directors

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	involvement or personal interest in the matter, ensuring appropriate independence and objectivity.			
Staff may have a conflict of interest that impacts on their ability to carry out their role appropriately, consistently and with integrity.	All staff at The Qualification Hub are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest. Staff and members of the Board must declare any possible conflicts they have upon starting work with us and update this should their circumstances change by completing and submitting a new Declaration of Interest Form to the Head of Operations. The Head of Operations is responsible for maintaining the Third Party Log and associated declarations and records within The Hub. In support of this we will undertake an annual check with each staff member to proactively check and identify potential and/or actual conflicts of interest that may have emerged in the interim period (e.g. ask them to re-sign the declaration form during their appraisal process).	Head of Operations	CEO	Board of Directors

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	In addition, to ensure that we actively reduce the risk of conflicts of interest arising amongst staff and the activities they undertake, we expect staff to comply with the spirit of the Nolan Principles of public life. Namely: ● **Selflessness** - staff have a general duty to act in the best interests of the organisation. ● **Integrity** - staff should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their role. ● **Objectivity** - in carrying out their role, staff should ensure that decisions are made solely on merit. ● **Accountability** – staff are accountable for their decisions and actions. ● **Openness** – staff should be as open as possible about their decisions and actions that they take. They should, where appropriate, give reasons for their decisions and restrict information only when the wider interest or procedure clearly demands.			

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	• **Honesty** – staff have a duty to declare any interests relating to their role in our Register of Interests and to take steps to resolve any conflicts that may arise. • **Leadership** – staff should have a good working relationship with colleagues and provide appropriate leadership and professionalism when carrying out their own role.			
Quality assurance staff (eg those involved in quality assurance, sampling, or EQA activity) involved in the design of assessments – including managers and those overseeing such staff - fail to highlight issues with the delivery and/or marking of the assessments when they carry out their quality assurance role (eg they may be less likely to identify issues with assessment	All staff at The Qualification Hub are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest. The work of all quality assurance staff (including EQAs, the Lead EQA, and the Head of Quality Assurance) is subject to ongoing monitoring, review, and standardisation arrangements to ensure that they carry out their roles effectively, consistently, and objectively, including where they have previously been involved in qualification or assessment development activity. The Lead EQA is responsible for monitoring the consistency and effectiveness of EQA activity and for reviewing the nature of findings, reports, sampling decisions, and quality assurance outcomes to ensure	Lead EQA	Head of Quality Assurance	Responsible Officer

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
arrangements, assessment decisions, assessment guidance, or quality assurance activity where they were involved in the original qualification or assessment development process).	that such individuals have acted consistently and appropriately, including where they have had prior involvement in qualification development activities. The Head of Quality Assurance provides oversight of these arrangements and will review trends, standardisation outcomes, and any identified concerns to ensure that assessment arrangements, assessment decisions, guidance, and quality assurance activities continue to operate effectively and in line with regulatory requirements. Where any actual or potential conflict of interest is identified, appropriate mitigation, escalation, or reassignment arrangements will be implemented in accordance with The Qualification Hub's Conflicts of Interest Policy.			
A member of staff is not suitable for a Senior Role, as defined within Ofqual's General Conditions of Recognition, but has still	Every new member of the Senior Leadership Team (SLT) and Board of Directors will be required to complete the declaration form referenced within Appendix 3 of the Governance Manual prior to appointment.	Head of Operations	CEO	Board of Directors

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
been appointed due to a close family, personal, or business relationship with someone else within TQH.	Once a signed declaration has been received, The Qualification Hub's Head of Operations will undertake the relevant checks and maintain the associated records within The Hub to provide assurance that the declaration is complete, accurate, and valid. We will undertake an annual check with each staff member or Board member to proactively check and identify any new developments that may affect their suitability that may have emerged in the interim period (e.g. ask them to re-sign the declaration form). Staff are required to immediately notify the Head of Operations if a change has occurred which they believe does or may affect their suitability to undertake a Senior Role, so that the matter can be reviewed and escalated appropriately in accordance with our governance arrangements. The CEO, in consultation with the Board where appropriate, will make the initial decision on whether any declaration prevents someone from undertaking a Senior Role within TQH.			

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	A report on the implementation of this process will be presented to the Board as part of our self-assessment reporting arrangements and/or immediately if a change in circumstances or declaration requires wider consideration by the Board as to whether the person concerned can undertake a specified senior role. The decisions and reports from the Senior Leadership Team (SLT) are reviewed by the Board when reviewing our self-assessment reports. The Board makes the final decisions in relation to our compliance with the General Conditions and is ultimately responsible for our compliance.			
An investigation into the suitability of someone to undertake a senior role was not robust enough due to their being a close family, personal or business relationship with someone	The CEO, in consultation with the Board where appropriate, will make the initial decision on whether any declaration, investigation outcome, or identified conflict prevents someone from undertaking a Senior Role within TQH. A report on the implementation of this process will be presented to the Board as part of our self-assessment reporting arrangements and/or	Head of Operations	CEO	Board of Directors

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
else within The Qualification Hub.	immediately if a change in circumstances or declaration requires wider consideration by the Board as to whether the person concerned can undertake a specified senior role. The decisions and reports from the Senior Leadership Team (SLT) are reviewed by the Board when reviewing our self-assessment reports. The Board makes the final decisions in relation to our compliance with the General Conditions and is ultimately responsible for our compliance.			
Staff involved in the design, development, review, or quality assurance of assessment materials knowingly or unknowingly disclose confidential information relating to assessments, assessment materials, assessment	The work of staff involved in the development, review, and quality assurance of assessment materials is subject to ongoing monitoring, review, and standardisation arrangements overseen by the Head of Quality Assurance to ensure that they carry out their roles effectively, consistently, objectively, and in line with agreed confidentiality and regulatory requirements. Third parties, contractors, consultants, and relevant personnel involved in qualification or assessment development activities must sign appropriate confidentiality and/or non-disclosure agreements as part of	Head of Qualification Development	Head of Quality Assurance	Responsible Officer

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
requirements, assessment arrangements, or qualification development activities to unauthorised individuals or organisations, including through external events, training activity, guidance materials, or other resources.	their contractual arrangements or through separate confidentiality agreements where appropriate. The contract, service agreement, or role specification for staff, contractors, and third parties involved in qualification or assessment development activity involving confidential materials will: include confidentiality clauses and expectations designed to ensure that confidential information, assessment materials, and associated information remain protected during and after their engagement with TQH; clearly set out that they must not provide, endorse, or seek endorsement for any prohibited training or activity which could compromise the confidentiality, integrity, or validity of TQH qualifications or assessment materials; require individuals to declare if they work for, support, or have any involvement with one of our centres in any capacity and whether the centre delivers any qualification, assessment, or assessment activity			

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	which they have contributed to developing, reviewing, or quality assuring. In such circumstances, the Head of Quality Assurance will be informed and will ensure that the conflict or declared interest is appropriately recorded within The Hub and considered as part of future centre monitoring, sampling, risk profiling, and quality assurance arrangements. TQH will undertake an annual review with relevant staff, contractors, and third parties to proactively identify any potential or actual conflicts of interest that may have emerged during the interim period (e.g. requiring them to re-sign the relevant declaration form as part of their annual review or appraisal process). Should an issue arise which suggests a conflict of interest and/or breach of confidentiality (including the loss, theft, or unauthorised disclosure of confidential assessment materials or information), and where there are reasonable grounds for the suspicion or allegation, the Head of Quality Assurance will be informed and will ensure that the matter is			

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	investigated rigorously, effectively, and by personnel of appropriate competence who have no personal interest in the outcome. In addition, where appropriate, relevant staff, contractors, and third parties involved in qualification or assessment development activity will: receive appropriate training relating to the protection and handling of confidential assessment materials and associated information; have contractual obligations requiring them to declare conflicts of interest relating to other professional or commercial activities they undertake; be required to promptly notify TQH where they are or have been involved in producing resources, training, or materials designed to support the preparation of actual or potential learners for the assessment of TQH qualifications where they have had access to confidential information or assessment materials;			

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	be subject to monitoring and review arrangements to ensure that access to confidential information does not compromise the validity, integrity, confidentiality, or fitness for purpose of assessment materials or qualification arrangements. For the purposes of this conflict, these arrangements apply to all staff, contractors, consultants, third parties, and relevant personnel involved in qualification development, assessment development, assessment review, quality assurance, or External Quality Assurance activity.			
Allocating an External Quality Assurer (EQA) to a centre where they may have an actual or potential conflict of interest, including where the EQA: has previously worked for the centre;	TQH will maintain records of all declared actual, potential, or perceived conflicts of interest relating to EQAs within the individual's profile record in The Hub. These records will be reviewed as part of centre allocation, EQA deployment, monitoring, and quality assurance activity to minimise the risk of inappropriate allocation decisions. All EQAs are required, upon appointment and on an ongoing basis, to declare any actual, potential, or perceived conflicts of interest relating to centres, learners, assessment activity, qualification delivery, or any	Lead EQA	Head of Quality Assurance	Senior Leadership Team (SLT)

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
has previously worked for a competing centre; has a family member or close personal relationship connected to the centre; has a financial interest, ownership stake, or shares in the centre; or holds a governance, trustee, or governor role associated with the centre.	activity connected to TQH qualifications. This includes any changes in circumstances arising during their engagement with TQH. The Hub contains system controls and conflict flagging functionality designed to support the identification of known conflicts of interest during centre allocation activity. Where a possible conflict exists, the system will flag the issue to authorised TQH personnel before allocation decisions are confirmed. EQAs must not normally be allocated to centres where an actual or potential conflict of interest exists which could adversely affect the objectivity, independence, consistency, validity, or integrity of quality assurance activity or assessment decisions. Where operational circumstances mean that a potential conflict cannot reasonably be avoided, the Lead EQA and Head of Quality Assurance will implement additional monitoring, scrutiny, sampling, and oversight arrangements proportionate to the level of identified risk. This may include:			

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	• enhanced review of EQA reports and sampling decisions; • additional monitoring or shadowing activity; • increased sampling of learner evidence or assessment decisions; • secondary review or countersigning of quality assurance outcomes; • temporary restrictions relating to the EQA's involvement in specific activities; and/or • reassignment of certain monitoring or decision-making responsibilities where appropriate. TQH will undertake periodic and annual reviews with EQAs and relevant staff to proactively identify any new or emerging conflicts of interest. This may include requiring individuals to re-complete or re-sign declaration forms as part of appraisal, standardisation, contracting, or annual review arrangements. The Head of Quality Assurance and Lead EQA will also review quality assurance findings, centre feedback, monitoring outcomes, and any identified trends or concerns to determine whether conflicts of interest may have adversely affected assessment or quality assurance decisions.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	Any identified concerns, suspected breaches, undeclared conflicts, or incidents relating to EQA conflicts of interest will be investigated in accordance with TQH's Conflicts of Interest Policy, Malpractice and Maladministration Policy, and governance arrangements. These arrangements support TQH's wider qualification governance, assessment validity, comparability, learner protection, and quality assurance requirements as outlined within the Qualification Development Manual and associated quality assurance arrangements.			
Staff involved in business development, centre engagement, onboarding, or commercial activity may seek to improperly influence centre recognition, qualification approval, quality assurance, or compliance decisions in a way which could	TQH operates a clear separation between business development activity and regulatory, centre approval, qualification approval, and quality assurance decision-making processes to reduce the risk of conflicts of interest or inappropriate influence. Staff involved in business development or commercial engagement activities are responsible for providing prospective centres with information relating to TQH services, qualifications, operational arrangements, and support processes only. Such staff may support onboarding and engagement activity but will not participate in formal	Head of Quality Assurance	CEO	Senior Leadership Team (SLT)

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
adversely affect learners, qualification integrity, regulatory compliance, or the reputation of TQH.	centre recognition, qualification approval, quality assurance, sanction, or compliance decisions. Formal centre recognition, qualification approval, due diligence activity, monitoring, and associated quality assurance decisions will be undertaken independently by appropriately authorised quality assurance personnel in accordance with TQH's Governance Manual, Qualification Development Manual, Centre Recognition arrangements, and associated quality assurance procedures. Approval and monitoring decisions must be based solely upon whether the centre has demonstrated that it meets TQH's published requirements and quality assurance expectations. Commercial considerations, learner recruitment potential, income generation, or business development targets must not influence approval, monitoring, or quality assurance decisions. The Head of Quality Assurance and relevant quality assurance personnel will monitor centre approval activity, EQA findings, quality assurance outcomes, and associated governance records to identify any			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	indications of inappropriate influence, conflicts of interest, inconsistent decision-making, or non-compliance with TQH arrangements. All approval decisions, risk assessments, monitoring outcomes, sanctions, and associated rationale will be appropriately documented and retained within The Hub to support transparency, governance oversight, auditability, and regulatory review activity. Any concerns relating to undue influence, inappropriate commercial pressure, conflicts of interest, malpractice, maladministration, or attempts to improperly influence approval or quality assurance decisions will be escalated and investigated in accordance with TQH's governance arrangements and associated policies and procedures.			
Contracted staff, consultants, suppliers, or third parties misuse confidential information, act contrary to the interests of TQH, or provide unauthorised services,	TQH will provide centres with guidance and requirements relating to the identification, declaration, management, and mitigation of conflicts of interest associated with the delivery, assessment, internal quality assurance, and administration of qualifications. Centres must ensure that assessment and internal quality assurance decisions are made objectively, fairly, consistently, and free from	Lead EQA	Head of Quality Assurance	Senior Leadership Team

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
advice, training, or support to learners, centres, or other organisations based upon information obtained through their work with TQH.	inappropriate influence or personal interest. Centres must not permit any person to undertake assessment, internal quality assurance, or related decision-making activity where an actual or potential conflict of interest could adversely affect the validity, reliability, comparability, fairness, or integrity of assessment outcomes. Centres are not permitted to offer financial incentives, performance-related payments, or other arrangements linked directly to learner achievement outcomes where such arrangements could compromise, or reasonably be perceived to compromise, the objectivity or integrity of assessment or quality assurance decisions. Any suspected breaches of these arrangements may be investigated in accordance with TQH's Malpractice and Maladministration Policy and associated governance arrangements. Centres will be required to declare any actual, potential, or perceived conflicts of interest as part of the centre recognition, qualification approval, and ongoing quality assurance process. Relevant information will be recorded within centre records in The Hub to support future monitoring, risk management, quality assurance activity, and governance oversight.			

Potential conflict of interest	**Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible**	**Responsibility for monitoring this process**	**Escalate too (if an incident occurs)**	**Overseeing Group who receives updates on the conflict and associated controls**
	External Quality Assurers (EQAs) will review centre assessment and internal quality assurance arrangements as part of ongoing quality assurance and monitoring activity. This may include reviewing staffing arrangements, sampling plans, assessment decisions, internal quality assurance records, and any identified or declared conflicts of interest. Relevant findings, actions, and concerns will be recorded within associated quality assurance records and centre monitoring records within The Hub. Where a conflict of interest cannot reasonably be avoided, for example due to limited staffing resources or specialist occupational expertise, TQH will require additional controls and oversight arrangements to be implemented to protect the integrity of assessment decisions. This may include additional internal quality assurance activity, independent sampling, increased EQA monitoring, or review of assessment decisions by another appropriately competent and independent individual. Any such arrangements must be reviewed and approved by the Lead EQA and recorded appropriately. Where a potential or actual conflict of interest is identified, TQH will take appropriate action to ensure that the validity, reliability, fairness, consistency, and integrity of assessment and quality assurance activity are protected. This may include restricting or removing individuals from			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	assessment, internal quality assurance, external quality assurance, or associated decision-making activities where necessary. All identified conflicts of interest, associated controls, actions taken, monitoring activity, and escalation decisions will be recorded, reviewed, monitored, and managed in accordance with TQH's governance arrangements, quality assurance arrangements, and associated policies and procedures.			
A member of staff has a close family, personal, or business relationship with an external supplier, contractor, consultant, or third party, and this relationship adversely affects, or could adversely affect, the recruitment, appointment, monitoring, investigation, review, or management of that supplier.	All staff, external suppliers, contractors, consultants, and third parties engaged by TQH will be required to declare any actual, potential, or perceived conflicts of interest in accordance with TQH's Conflicts of Interest Policy, confidentiality arrangements, governance procedures, and any other applicable legal or professional obligations. The Senior Leadership Team (SLT) is responsible for ensuring that appropriate due diligence, recruitment checks, references, suitability reviews, and proportionate background checks are undertaken prior to the appointment or engagement of external suppliers or third parties. This includes ensuring that suitable and enforceable contractual arrangements are in place, including provisions relating to	Head of Operations	CEO	Senior Leadership Team (SLT)

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
And/or investigations, reviews, monitoring activity, or performance management relating to an external supplier are not sufficiently objective, independent, or robust due to an undeclared or unmanaged close family, personal, or business relationship with someone within TQH.	confidentiality, conflicts of interest, data protection, professional conduct, intellectual property, and organisational integrity. TQH may undertake proportionate checks and monitoring activity in relation to suppliers and third parties where appropriate. This may include reviewing publicly available information, websites, declared commercial interests, social media presence, previous working arrangements, financial standing, and any other information relevant to the role, service, or activity being undertaken. The CEO is responsible for ensuring that the Senior Leadership Team (SLT) receives appropriate reports, updates, and oversight information relating to the appointment, performance, suitability, compliance, and ongoing monitoring of external suppliers and third parties. All records relating to supplier appointments, declarations of interest, contractual arrangements, monitoring activity, investigations, reviews, governance decisions, and associated evidence will be retained within The Hub and associated governance records to support auditability, future reviews, regulatory oversight, and internal quality assurance activity.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	The work of external suppliers and third parties will be subject to ongoing monitoring, review, and oversight by the Senior Leadership Team (SLT) and relevant managers to ensure that they continue to operate effectively, professionally, objectively, and in accordance with TQH policies, procedures, contractual obligations, confidentiality requirements, and regulatory expectations. TQH will ensure that external suppliers and associated personnel do not undertake any activity which could conflict with, compromise, or adversely affect the interests, integrity, confidentiality, validity, reputation, or operational effectiveness of TQH qualifications or operations. Regular meetings, monitoring activity, supplier reviews, and governance discussions will include standing agenda items requiring the declaration of any new or emerging actual, potential, or perceived conflicts of interest. Any suspected undeclared conflicts of interest, inappropriate conduct, failure to follow procedures, malpractice, maladministration, breaches			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	of confidentiality, or activity contrary to TQH's interests will be investigated and managed in accordance with TQH governance arrangements, policies, and procedures. TQH's approach reflects the relevant regulatory guidance relating to conflicts of interest, governance, confidentiality, and organisational controls, including the arrangements referenced within Condition A4 and associated governance records maintained within The Hub. Reports relating to the appointment, monitoring, review, and ongoing suitability of external suppliers and third parties will be provided to the Senior Leadership Team (SLT) as part of TQH's governance, self-assessment, risk management, and quality assurance arrangements, including where significant suppliers or new third-party arrangements are introduced.			
The investigation, review, or decision-making process relating to malpractice, maladministration, adverse	The Head of Quality Assurance is responsible for ensuring that robust, objective, and appropriately independent investigations and reviews are undertaken in accordance with TQH policies, procedures, governance arrangements, and regulatory expectations.	Head of Quality Assurance	CEO	Board of Directors

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
effects, appeals, complaints, quality assurance activity, or regulatory matters was undertaken, influenced, or potentially influenced — directly or indirectly — by an individual who had a personal, professional, commercial, or other interest in the outcome.	Where an allegation, investigation, review, appeal, complaint, or decision relates to an activity, decision, relationship, or matter involving the Head of Quality Assurance, or where there is an actual, potential, or perceived conflict of interest involving the Head of Quality Assurance, they will be excluded from the investigation, review, decision-making process, and associated communications and updates. Responsibility for oversight and decision-making will be reassigned to an appropriately authorised and independent individual in accordance with TQH governance arrangements. TQH will ensure that investigations and associated decisions are undertaken objectively, independently, proportionately, and based on appropriate evidence and documented procedures. Appropriate steps will be taken to minimise the risk of conflicts of interest adversely affecting investigations, outcomes, assessment decisions, learner interests, qualification integrity, regulatory compliance, or organisational reputation.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	Should these procedures be implemented, TQH will retain appropriate evidence and records including, where applicable: • details of the allegation, concern, incident, or referral and the individual or organisation raising the matter, together with any initial evidence provided; • records of the initial review, risk assessment, and associated decisions, including whether regulators, funding bodies, centres, or other relevant parties should be informed; • details of investigator appointments, independence considerations, and conflict of interest reviews; • communications with relevant parties including centres, learners, staff, regulators, funding bodies, external agencies, or law enforcement where applicable; • evidence collected, reviewed, and considered during the investigation or review process; • records of meetings, interviews, findings, recommendations, governance reviews, and decision-making activity; • details of sanctions, actions, controls, or remedial measures implemented; and			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	• records of notifications, reporting activity, appeals, reviews, or follow-up monitoring activity where applicable. All records, evidence, decisions, communications, and associated documentation will be securely retained within The Hub and associated governance records to support auditability, regulatory oversight, quality assurance activity, future reviews, and internal or external investigations. The Head of Quality Assurance will normally make the initial decision regarding investigation findings, outcomes, sanctions, or actions arising from investigations unless excluded from involvement due to an actual, potential, or perceived conflict of interest. Investigation reports, outcomes, governance decisions, and associated actions will be reported to the Senior Leadership Team (SLT) and the Board as part of TQH's governance, quality assurance, and risk management arrangements.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	The Board is responsible for reviewing and scrutinising investigation processes, governance decisions, and associated outcomes to provide assurance that: • appropriate procedures were followed; • investigations were objective, proportionate, and evidence-based; • governance arrangements operated effectively; and • no actual, potential, or perceived conflicts of interest improperly influenced the investigation process, findings, or final decisions.			
Ensuring staff do not receive gifts, benefits, hospitality, inducements, or other advantages that may improperly influence, or reasonably be perceived to influence, their professional judgement, objectivity, impartiality, assessment decisions, qualification	TQH requires all staff, contractors, consultants, Subject Matter Experts, governance members, and associated personnel to act with integrity, impartiality, objectivity, and professionalism at all times and to avoid any situation which may create an actual, potential, or perceived conflict of interest. Hospitality, gifts, benefits, inducements, or offers of preferential treatment which might reasonably be viewed as compromising an individual's judgement, integrity, independence, objectivity, or decision-making must be refused. This includes any offer which could	Head of Operations and Head of Quality Assurance	Responsible Officer	Senior Leadership Team (SLT)

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
development activity, governance responsibilities, or operational decision-making.	reasonably be perceived as influencing assessment decisions, qualification development activity, quality assurance outcomes, procurement decisions, governance activity, centre approval activity, or other operational or commercial decisions. Staff must not place themselves in a position where acceptance of hospitality, gifts, benefits, or other advantages could reasonably be perceived by learners, centres, regulators, employers, stakeholders, or members of the public as influencing, or having the potential to influence, a professional or business decision. Offers of gifts, hospitality, inducements, discounts, incentives, or other benefits of more than nominal or low intrinsic value should be politely but firmly declined. Where an individual is placed under pressure to accept such an offer, or where refusal may create operational, reputational, cultural, or relationship concerns, the individual must immediately inform their line manager and the Head of Operations so that appropriate guidance, oversight, and risk management arrangements can be implemented.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	TQH recognises that certain low-value items of nominal or customary value — such as diaries, calendars, flowers, modest seasonal gifts, or small promotional items — may not normally present a material conflict of interest risk. However, where any uncertainty exists regarding the appropriateness of accepting any item, benefit, or hospitality, staff must seek guidance from their line manager and/or the Head of Operations before acceptance. Staff, contractors, Subject Matter Experts, and governance personnel must declare any gifts, hospitality, benefits, inducements, or offers which may create, or reasonably be perceived to create, an actual or potential conflict of interest in accordance with TQH's Conflicts of Interest Policy and associated governance arrangements. Any concerns relating to inappropriate gifts, hospitality, inducements, attempted influence, bribery risks, or associated conduct will be investigated in accordance with TQH policies and procedures. Appropriate records will be retained including, where applicable: • details of the gift, hospitality, benefit, inducement, or offer; • the individual(s) involved;			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	• any declarations made; • advice sought or provided; • actions taken; • associated communications; • investigation activity where applicable; and • final decisions and outcomes. These records will be retained within The Hub and associated governance records to support auditability, governance oversight, quality assurance activity, and future internal or external review activity where required. TQH will ensure that staff receive appropriate induction, training, guidance, and ongoing reminders relating to conflicts of interest, ethical conduct, bribery prevention, governance expectations, and professional standards as part of its governance and quality assurance arrangements.			
Arrangements, partnerships, or engagements with	TQH does not currently operate formal endorsement arrangements with publishers or external resource providers. However, should TQH enter into such arrangements in the future, the Head of Quality			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
publishers or resource providers may create actual, potential, or perceived conflicts of interest which could adversely affect the objectivity, integrity, confidentiality, validity, or regulatory compliance of TQH qualifications, assessments, or endorsement activity.	Assurance will be responsible for ensuring that all endorsement activity is undertaken in a fair, objective, transparent, proportionate, and regulatory compliant manner. TQH will take all reasonable steps to ensure that any endorsement activity does not create an Adverse Effect, compromise the integrity or confidentiality of qualifications or assessments, or improperly advantage any publisher, learner, centre, or external organisation. TQH will publish and maintain clear criteria relating to the endorsement of external resources, materials, or support products to ensure consistency, transparency, objectivity, and fairness in decision-making. Any endorsement provided by TQH will be communicated consistently across all endorsed resources, including where resources are produced internally or by associated organisations. Endorsement arrangements, logos, wording, or statements must not imply that endorsed resources contain privileged assessment insight, confidential assessment materials, advance assessment information, or that use of the endorsed resource is required in order to successfully complete a qualification or assessment.	Head of Quality Assurance	CEO	Senior Leadership Team

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	TQH will ensure that appropriate contractual, governance, confidentiality, and monitoring arrangements are established with publishers or endorsed resource providers to minimise the risk of misleading marketing practices, inappropriate claims, conflicts of interest, or misuse of TQH branding or endorsement status. For the purposes of this policy, endorsement activity refers to arrangements where TQH formally reviews, approves, endorses, or supports external resources intended to assist actual or potential learners in preparing for the assessment of TQH qualifications. Any engagement with publishers or resource providers relating to endorsement activity will be managed through appropriate governance and quality assurance arrangements overseen by the Head of Quality Assurance. Relevant decisions, records, reviews, agreements, declarations, monitoring activity, and associated evidence will be retained within The Hub and associated governance records. Any actual, potential, or perceived conflicts of interest relating to publishers, endorsement activity, resource providers, or associated			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	commercial arrangements will be declared, monitored, reviewed, and managed in accordance with TQH's Conflicts of Interest Policy, Governance Manual, Qualification Development Manual, and associated policies and procedures. Any concerns relating to inappropriate endorsement activity, confidentiality breaches, misleading claims, misuse of branding, conflicts of interest, malpractice, maladministration, or regulatory risk will be escalated and investigated in accordance with TQH governance arrangements.			
Marketing, promotional activity, public communications, or endorsement-related activity may contain inaccurate, misleading, inappropriate, non-compliant, or biased information, or may be influenced by actual,	The Head of Quality Assurance is responsible for ensuring that appropriate review and approval arrangements are in place for marketing, promotional, endorsement, qualification, assessment, and public information prior to publication or implementation to ensure that information is accurate, clear, appropriate, not misleading, and compliant with regulatory expectations and TQH governance arrangements. TQH will ensure that marketing and promotional activity accurately reflects the nature, purpose, level, assessment requirements, approval	Head of Quality Assurance	CEO	Senior Leadership Team (SLT)

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
potential, or perceived conflicts of interest.	status, recognition status, and intended use of qualifications and associated services. Marketing materials must not contain statements which could mislead learners, centres, employers, regulators, funding bodies, or other stakeholders regarding qualification outcomes, assessment requirements, endorsement activity, progression opportunities, regulatory status, or learner achievement. The Head of Quality Assurance is responsible for overseeing arrangements relating to endorsement activity, marketing compliance, qualification information, and associated governance controls. Should TQH's position relating to endorsement activity, publisher arrangements, or associated commercial activity change, appropriate governance review, regulatory consideration, and approval arrangements will be implemented in accordance with TQH governance procedures. The Senior Leadership Team (SLT) will receive appropriate updates relating to marketing arrangements, endorsement activity, public communications, reputational risks, and associated governance matters. Where appropriate, significant changes, strategic decisions, or			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	high-risk matters may also be escalated to the Board for review and consideration. The Senior Leadership Team (SLT) will review marketing and promotional arrangements as part of TQH's governance, self-assessment, risk management, and quality assurance arrangements. This includes considering whether any actual, potential, or perceived conflicts of interest may have improperly influenced marketing decisions, endorsement activity, public communications, qualification information, or associated operational arrangements. The Board will review significant governance, regulatory, reputational, endorsement, or strategic matters escalated by the Senior Leadership Team (SLT) where appropriate, including reviewing whether decisions were reasonable, proportionate, appropriately evidenced, compliant with procedures, and free from inappropriate influence or unmanaged conflicts of interest. All relevant records, approvals, governance decisions, reviews, communications, monitoring activity, and associated evidence relating to marketing, endorsement activity, and associated governance			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	arrangements will be retained within The Hub and associated governance records to support auditability, regulatory oversight, quality assurance activity, and future internal or external review activity where required. Any concerns relating to misleading marketing, inappropriate claims, endorsement activity, reputational risk, conflicts of interest, malpractice, maladministration, or regulatory non-compliance will be escalated and managed in accordance with TQH's Governance Manual, Qualification Development Manual, Conflicts of Interest Policy, and associated procedures.			
Staff recruitment, appointment, promotion, supervision, management, disciplinary, appraisal, or other employment-related decisions may be improperly influenced where a member of staff involved in the process has a close family, personal, or	TQH maintains arrangements relating to the employment, management, and declaration of relationships involving close family members, partners, spouses, or other close personal relationships to minimise the risk of conflicts of interest affecting recruitment, employment, governance, operational, or management decisions. Staff are required to declare any actual, potential, or perceived conflicts of interest relating to recruitment, appointment, promotion, supervision, management, appraisal, disciplinary, contractual, or other	Head of Operations	CEO	Senior Leadership Team (SLT)

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
business relationship with the candidate or employee concerned.	employment-related activity as soon as they become aware of the conflict or relevant relationship. The Head of Operations is responsible for maintaining associated declarations, records, and conflict of interest information within The Hub and ensuring that appropriate controls, restrictions, and governance arrangements are implemented where necessary. Where a conflict of interest exists, the related individual must not participate in, influence, oversee, or have access to any part of the relevant recruitment, selection, interview, appointment, appraisal, disciplinary, contractual, or management process where their involvement could compromise, or reasonably be perceived to compromise, fairness, objectivity, integrity, confidentiality, or independence. This includes restrictions relating to involvement in shortlisting, interview panels, scoring activity, decision-making, performance management, disciplinary arrangements, access to confidential information, interview questions, assessment tasks, recruitment			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	materials, appraisal documentation, or other associated records or activities. TQH will ensure that recruitment and employment-related decisions are based upon objective, evidence-based, transparent, and appropriately documented processes designed to support fairness, equality, integrity, and regulatory compliance. Where an actual or potential conflict of interest is identified retrospectively, or where concerns arise regarding the integrity or fairness of a recruitment or employment-related decision, TQH will undertake an appropriate review to determine whether the conflict may have adversely affected the process, outcome, governance arrangements, operational effectiveness, or wider organisational interests. Appropriate corrective, remedial, or governance actions will be implemented where necessary. All declarations, restrictions, reviews, decisions, actions, and associated governance records relating to recruitment and employment-related conflicts of interest will be retained within The Hub and associated			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	governance records to support auditability, governance oversight, quality assurance activity, and future internal or external review activity where required. Any concerns relating to undeclared relationships, inappropriate influence, unfair recruitment activity, conflicts of interest, misconduct, malpractice, maladministration, or breaches of TQH procedures will be escalated and managed in accordance with TQH governance arrangements and associated policies and procedures.			
Employees, contractors, or associated personnel of TQH may be directly or indirectly involved in other employment, commercial activity, consultancy, business interests, qualification-related activity, or external roles which could create an actual, potential, or	TQH contracts of employment, contractual arrangements, and associated governance procedures require staff, contractors, consultants, and relevant personnel to declare any external employment, consultancy, business interests, qualification-related activity, governance role, or other professional activity which may create an actual, potential, or perceived conflict of interest with their role at TQH. Staff must not undertake external employment, consultancy, business activity, or other professional commitments which could conflict with, compromise, or adversely affect the integrity, confidentiality, objectivity,	Head of Operations	CEO	Senior Leadership Team (SLT)

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
perceived conflict of interest and adversely affect the integrity, objectivity, confidentiality, independence, or effectiveness of their role within TQH.	impartiality, operational effectiveness, regulatory compliance, or reputation of TQH qualifications or operations without first obtaining appropriate approval in accordance with TQH governance arrangements. The Head of Operations is responsible for maintaining records of approved declarations, permissions, conflicts of interest, and associated governance decisions within The Hub and associated governance records. Failure to declare relevant external interests, employment, commercial activity, consultancy arrangements, or other potentially conflicting activity may be treated as a breach of contractual obligations, governance arrangements, or associated TQH policies and procedures and may result in formal review, disciplinary action, contractual review, restriction of duties, or other appropriate action. Where an actual, potential, or perceived conflict of interest is identified, TQH will implement proportionate controls, restrictions, monitoring arrangements, or reassignment activity where necessary to protect the integrity, validity, objectivity, confidentiality, and effectiveness of			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	qualification development, qualification delivery, assessment, quality assurance, governance, or operational activity. TQH employees, contractors, consultants, and associated personnel are also required to declare where they, a family member, close personal contact, or associated individual are undertaking, registered on, delivering, assessing, quality assuring, or otherwise involved with a TQH qualification or associated centre activity. The Lead EQA and relevant managers will ensure that appropriate restrictions, reassignment arrangements, monitoring activity, quality assurance controls, or governance actions are implemented where necessary to minimise the risk of conflicts of interest adversely affecting qualification development, assessment decisions, learner interests, quality assurance activity, or wider governance arrangements. Where a conflict of interest or Adverse Effect is identified retrospectively, TQH will undertake an appropriate review to determine whether qualification validity, assessment integrity, learner interests, governance decisions, operational activity, or regulatory compliance may have been adversely affected. Appropriate remedial, corrective,			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	governance, quality assurance, or regulatory actions will be implemented where necessary. All declarations, reviews, permissions, restrictions, governance decisions, investigations, monitoring activity, actions, and associated evidence will be retained within The Hub and associated governance records to support auditability, governance oversight, regulatory review, and future internal or external investigation activity where required. Any concerns relating to undeclared interests, inappropriate external activity, conflicts of interest, breaches of confidentiality, malpractice, maladministration, or activity contrary to the interests of TQH will be escalated and managed in accordance with TQH's Governance Manual, Qualification Development Manual, Conflicts of Interest Policy, and associated procedures.			
An actual, potential, or perceived conflict of interest arises in relation to the Responsible Officer's duties, decisions, conduct, activities, relationships,	TQH recognises the significance of the Responsible Officer role as defined within the Governance Manual and associated regulatory arrangements, including the requirement for the post-holder to act with integrity, objectivity, professionalism, independence, and in accordance with regulatory expectations at all times.	Chair of the Board	Board of Directors	Board of Directors

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
external interests, or wider involvement within or outside of TQH, which could adversely affect regulatory compliance, governance arrangements, qualification integrity, organisational effectiveness, or public confidence.	TQH will ensure that appropriate due diligence, suitability checks, declarations, governance reviews, and appointment arrangements are undertaken prior to appointing an individual to the Responsible Officer role and throughout the duration of their appointment. The Responsible Officer is required to declare any actual, potential, or perceived conflicts of interest relating to their duties, activities, external interests, relationships, professional activity, governance involvement, or other circumstances which could reasonably be perceived to affect their objectivity, independence, judgement, integrity, or ability to fulfil the role effectively. Where allegations, concerns, incidents, disclosures, governance concerns, or other information indicate that an actual, potential, or perceived conflict of interest involving the Responsible Officer may exist, the matter will be escalated to the Chair of the Board who will oversee appropriate review, investigation, governance consideration, and decision-making arrangements. Any review or investigation relating to the Responsible Officer will be undertaken objectively, proportionately, independently, and in			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	accordance with TQH governance arrangements. Appropriate controls will be implemented to ensure that the Responsible Officer does not improperly influence the investigation, review process, governance activity, evidence gathering, decision-making, or associated communications where a conflict may exist. Depending on the nature, severity, evidence, and outcome of the investigation or review, actions may include: • no further action where concerns are not substantiated; • additional monitoring, governance oversight, guidance, or management controls; • restrictions relating to specific activities, decisions, responsibilities, or access arrangements; • implementation or revision of conflict of interest controls and governance arrangements; • formal management, contractual, governance, or disciplinary action where appropriate; • notification to regulators or other relevant external bodies where required; and/or			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	• termination of appointment, employment, or governance involvement where a serious breach, unmanaged conflict of interest, regulatory concern, or significant Adverse Effect has occurred. TQH will ensure that all allegations, reviews, investigations, governance decisions, declarations, actions, controls, communications, and associated evidence relating to the Responsible Officer are appropriately documented and retained within The Hub and associated governance records to support auditability, governance oversight, regulatory review, and future internal or external scrutiny where required. The Board is responsible for reviewing and overseeing matters relating to the suitability, effectiveness, conduct, independence, and governance arrangements associated with the Responsible Officer role and for ensuring that any conflicts of interest are identified, managed, monitored, and escalated appropriately in accordance with TQH governance arrangements and regulatory expectations.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
The CEO's combined roles as CEO, Responsible Officer (RO), and Board member may create actual, potential, or perceived conflicts of interest.	TQH recognises that the CEO also undertakes the role of Responsible Officer (RO) and sits on the Board of Directors. Due to the significance of these combined responsibilities, additional governance controls and oversight arrangements are implemented to ensure that conflicts of interest are appropriately identified, managed, monitored, mitigated, escalated, and independently reviewed where necessary. Appropriate due diligence, suitability checks, declarations, governance reviews, and appointment arrangements will be undertaken prior to appointment and throughout the duration of the CEO/RO role. The CEO/RO is required to declare any actual, potential, or perceived conflicts of interest relating to their professional duties, governance involvement, regulatory responsibilities, external activities, financial interests, personal relationships, or any other circumstances which may reasonably be perceived to affect their independence, objectivity, integrity, judgement, or ability to fulfil their responsibilities effectively. Where any allegation, concern, disclosure, complaint, incident, whistleblowing matter, governance concern, regulatory issue, or other information indicates that an actual, potential, or perceived conflict of interest involving the CEO/RO may exist, the matter will be referred	Non-conflicted members of the Board of Directors	Chair of the Board / Non-conflicted Board Members	Board of Directors (excluding the CEO/RO where conflicted)

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	immediately to the non-conflicted members of the Board of Directors. The CEO/RO will not participate in discussions, investigations, evidence review, decision-making, governance activity, or oversight arrangements relating to the matter where a conflict exists or may reasonably be perceived to exist. The non-conflicted members of the Board will appoint an appropriate independent individual, senior leader, external advisor, or other suitably qualified person to undertake or oversee any investigation, review, governance assessment, or regulatory response where necessary. Additional independent governance support may be obtained where required to ensure objectivity, integrity, and regulatory confidence. Depending on the nature, seriousness, evidence, impact, and outcome of the matter, actions may include: • no further action where concerns are not substantiated; • implementation of additional monitoring, governance oversight, supervision, or management controls;			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	• restrictions relating to specific duties, decisions, regulatory activity, governance involvement, access arrangements, or authority; • temporary reassignment of Responsible Officer responsibilities where appropriate; • review and strengthening of governance or conflict of interest controls; • formal management, contractual, governance, or disciplinary action; • notification to regulators and/or relevant external bodies where required; and/or • termination of employment, appointment, Board involvement, or Responsible Officer status where serious misconduct, unmanaged conflicts, governance failure, regulatory breach, or significant Adverse Effect has occurred. All declarations, concerns, investigations, governance actions, decisions, controls, communications, and associated evidence relating to CEO/RO conflicts of interest will be appropriately documented, retained, reviewed, and made available for audit, governance review, and regulatory scrutiny where required.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	The Board of Directors (excluding the CEO/RO where conflicted) is responsible for ensuring that appropriate governance arrangements, independence measures, escalation processes, and oversight controls operate effectively in relation to the CEO/RO role and that any actual or potential conflicts of interest are managed in accordance with TQH governance arrangements and regulatory expectations.			
Appeals, reviews, or investigations are carried out, influenced, or overseen by an individual who has had previous involvement in the matter under appeal or who has a personal, professional, commercial, or other interest in the outcome of the appeal or investigation.	TQH will ensure that all appeals, reviews, investigations, and associated decision-making activity are undertaken in a fair, objective, proportionate, and appropriately independent manner in accordance with TQH governance arrangements, quality assurance procedures, and regulatory expectations. The Head of Quality Assurance is responsible for overseeing the management of appeals and for assigning an appropriate member of staff, independent reviewer, or other suitably competent individual to lead or support the appeal review or investigation process. Personnel assigned to appeal reviews, investigations, or associated decision-making activity must have the appropriate level of competence, training, occupational understanding, and authority relevant to the matter being considered. They must not have had prior	Head of Quality Assurance	CEO	Board of Directors

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	involvement in the original assessment decision, quality assurance activity, investigation, complaint, centre decision, or other matter under review where such involvement could compromise, or reasonably be perceived to compromise, their independence, objectivity, or impartiality. Where an actual, potential, or perceived conflict of interest exists, TQH will implement appropriate controls, reassignment arrangements, governance oversight, or independent review activity to ensure that the integrity, fairness, objectivity, and credibility of the appeal process are maintained. The Governance Manual, qualification delivery arrangements, appeals procedures, and associated policies and procedures contain details of the personnel and governance arrangements that may support, review, oversee, or participate in appeal and investigation activity relating to different areas of TQH operations. Appropriate records and evidence relating to appeals and investigations will be retained within The Hub and associated governance records, including where applicable:			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	• details of the appeal, allegation, concern, or referral; • conflict of interest declarations and reviews; • investigator or reviewer appointment decisions; • evidence reviewed and communications undertaken; • governance reviews and decisions; • actions, outcomes, sanctions, or remedial activity; and • notifications to regulators or external parties where required. Where concerns arise regarding the objectivity, independence, conduct, or effectiveness of an appeal or investigation process, the matter will be escalated and reviewed in accordance with TQH governance arrangements and associated policies and procedures. These arrangements are designed to ensure that appeal and investigation activity remains independent, evidence-based, appropriately governed, and free from inappropriate influence or unmanaged conflicts of interest.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
When preparing, reviewing, contributing to, or submitting self-assessment evidence, compliance statements, governance reports, or annual self-evaluation information, members of the Senior Leadership Team (SLT) may fail to identify, disclose, challenge, escalate, or appropriately report weaknesses, risks, non-compliance, governance concerns, or operational issues within their own area or another colleague's area due to personal, professional,	TQH will undertake regular self-assessment, governance review, compliance monitoring, and self-evaluation activity against the Conditions of Recognition and associated regulatory requirements to ensure that governance, qualification development, qualification delivery, assessment, quality assurance, and operational arrangements remain effective, compliant, proportionate, and appropriately controlled. The CEO, acting in their capacity as Responsible Officer (RO), is responsible for overseeing the preparation and coordination of TQH's self-assessment and compliance review arrangements, including the annual self-evaluation process and associated governance reporting activity. Self-assessment and compliance review activity may include, where appropriate: • review of changes to policies, procedures, governance arrangements, and operational controls; • review and sampling of qualification development, qualification delivery, learner registration, certification, quality assurance,	CEO / Responsible Officer	Board of Directors	Board of Directors

Potential conflict of interest	**Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible**	**Responsibility for monitoring this process**	**Escalate too (if an incident occurs)**	**Overseeing Group who receives updates on the conflict and associated controls**
operational, or reputational interests.	monitoring, standardisation, appeals, complaints, malpractice, maladministration, and centre management activity; • review of governance records, risk management arrangements, audit trails, compliance logs, and associated evidence; • analysis of trends, operational performance, learner feedback, centre feedback, quality assurance outcomes, reasonable adjustments, special considerations, and associated monitoring information; • consideration of regulatory updates, sector developments, external reports, lessons learned, and emerging risks relevant to TQH operations; • interviews, meetings, reviews, and discussions with relevant staff, contractors, Subject Matter Experts, governance personnel, and associated stakeholders; and • independent external review, consultancy, governance support, or specialist advice where appropriate. TQH will ensure that self-assessment activity is evidence-based, appropriately documented, proportionate, objective, and sufficiently independent to identify strengths, weaknesses, risks, trends, governance concerns, operational issues, and opportunities for improvement.			

Potential conflict of interest	**Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible**	**Responsibility for monitoring this process**	**Escalate too (if an incident occurs)**	**Overseeing Group who receives updates on the conflict and associated controls**
	Members of the Senior Leadership Team (SLT), managers, and relevant personnel are expected to contribute openly, honestly, objectively, and professionally to self-assessment and governance review activity and must not withhold, minimise, misrepresent, or fail to escalate information relating to compliance concerns, governance weaknesses, operational risks, Adverse Effects, or actual or potential conflicts of interest. Where appropriate, TQH may obtain independent external input, review, challenge, or specialist support to strengthen governance assurance, objectivity, regulatory confidence, and compliance review arrangements. Findings, actions, risks, governance decisions, lessons learned, compliance reviews, monitoring activity, and associated evidence relating to self-assessment and governance review activity will be documented and retained within TQH governance and compliance records in accordance with governance arrangements and record retention procedures.			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	Regular compliance and self-assessment updates will be provided to the Board of Directors as part of TQH's governance, risk management, quality assurance, and regulatory oversight arrangements. The Board of Directors is responsible for reviewing, scrutinising, and challenging self-assessment findings, governance reports, compliance statements, identified risks, operational concerns, and associated actions to provide assurance that governance arrangements remain effective, evidence-based, objective, and free from inappropriate influence or unmanaged conflicts of interest.			
The CEO and/or Responsible Officer (RO) presents a more positive self-assessment, governance report, compliance statement, or statement of compliance than the available evidence, findings, risks, or operational activity would reasonably support in order	TQH recognises the importance of ensuring that self-assessment activity, governance reporting, compliance reviews, annual statements of compliance, and associated governance information are accurate, evidence-based, objective, proportionate, and reflective of the organisation's actual level of compliance and operational effectiveness. The CEO, acting in their capacity as Responsible Officer (RO), is responsible for coordinating and presenting self-assessment findings, governance reviews, compliance information, and associated reports to the Senior Leadership Team (SLT) and Board of Directors.	Senior Leadership Team (SLT)	Board of Directors	Board of Directors

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
to avoid criticism, regulatory scrutiny, governance challenge, reputational concern, or operational escalation.	Members of the Senior Leadership Team (SLT) are responsible for contributing appropriate evidence, governance information, operational findings, risk information, quality assurance outcomes, compliance updates, and associated monitoring information relating to their areas of responsibility as part of TQH's self-assessment and governance review arrangements. The Senior Leadership Team (SLT) will review, challenge, scrutinise, and discuss the findings, evidence, governance conclusions, operational risks, and proposed statements of compliance presented by the CEO/RO and relevant managers during dedicated governance and self-assessment review meetings. The purpose of these review arrangements is to ensure that governance reporting, self-assessment findings, operational evaluations, and statements of compliance remain objective, evidence-based, appropriately challenged, transparent, and free from inappropriate influence, bias, omission, or unmanaged conflicts of interest. The Board of Directors will review, scrutinise, and challenge the findings, governance conclusions, self-assessment reports, compliance			

Potential conflict of interest	Reasonable steps to ensure that no conflicts of interest have an Adverse Effect (as defined by Ofqual) and/or that such effects are mitigated as far as possible	Responsibility for monitoring this process	Escalate too (if an incident occurs)	Overseeing Group who receives updates on the conflict and associated controls
	statements, supporting evidence, identified risks, actions, and proposed statement of compliance presented by the CEO/RO and Senior Leadership Team (SLT). The Board is responsible for ensuring that sufficient governance challenge, independence, oversight, and scrutiny has been applied to self-assessment activity and associated compliance reporting prior to approval or sign-off of any annual statement of compliance or related governance submission. The Board of Directors makes the final governance decision regarding TQH's statement of compliance, governance assurance arrangements, and organisational compliance with the General Conditions of Recognition and associated regulatory obligations. Where concerns arise regarding the accuracy, completeness, objectivity, transparency, independence, or integrity of self-assessment findings, governance reporting, compliance statements, or associated evidence, the matter will be escalated and reviewed in accordance with TQH governance arrangements. Independent external review, governance support, audit activity, or specialist advice may also be obtained where			

Process	Current Lead Officer	Back-up Officer
CEO / Responsible Officer (RO) responsibilities	CEO / Responsible Officer	An appropriately competent, authorised, and independent individual appointed by the Board of Directors
Qualification development and qualification design activity	Head of Qualification Development	Head of Quality Assurance

Qualification review, amendment, and withdrawal activity	Head of Qualification Development	Head of Quality Assurance
Qualification development administration and operational coordination	Head of Qualification Development	Head of Operations
Qualification governance reporting and monitoring	Head of Qualification Development	Head of Quality Assurance
Centre recognition and qualification approval	Lead EQA	Head of Quality Assurance
Centre monitoring and standardisation	Lead EQA	Head of Quality Assurance
Application of sanctions	Lead EQA	Head of Quality Assurance
Complaints	Lead EQA	Head of Quality Assurance

Appeals	Lead EQA	Head of Quality Assurance
Investigations (including malpractice and maladministration)	Lead EQA	Head of Quality Assurance
Reasonable adjustments and special considerations	Lead EQA	Head of Quality Assurance
Requests for Recognition of Prior Learning (RPL), exemptions, and equivalences	Lead EQA	Head of Quality Assurance
Regulatory compliance oversight and quality assurance monitoring	Head of Quality Assurance	CEO / Responsible Officer

Conflict of Interest Policy Summary

Each responsibility within this policy is assigned to a clearly defined role within TQH's organisational structure, with appropriate escalation routes and supporting processes embedded through staff training, governance arrangements, and operational controls. The approach is designed to align with Ofqual's General Conditions of Recognition (GCOR) and reflects TQH's 2025 organisational structure and governance framework.

The policy provides TQH with a robust and structured framework to identify, declare, record, monitor, manage, and escalate actual, potential, and perceived conflicts of interest. It requires proactive engagement from all staff and associates, supports independence and objectivity within investigations and decision-making processes, and includes routine oversight by the Senior Leadership Team and the Board of Directors.

Clear governance and escalation arrangements help ensure that conflicts of interest are identified and addressed promptly, consistently, and transparently, thereby protecting regulatory compliance, organisational integrity, public confidence, and the validity of TQH's qualifications and associated activities.

TQH's Conflict Management Framework