Conflict of Interest Policy

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Revisions		
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Table of Contents

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1. Policy principles

For the purpose of this policy, a conflict of interest is defined as a situation in which an individual, or organisation, has, or may be perceived to have, competing interests or loyalties which could lead to a potentially subjective, biased, or corrupt decision being made by that individual or organisation.

Active IQ recognises and encourages the promotion of building successful business and external relationships. In doing so, we are mindful that there may be situations when a perceived or potential conflict of interest may arise and that we have a duty to identify, manage and mitigate potential conflicts of interest.

As such, where a potential conflict may be identified, Active IQ colleagues must follow the guidance outlined in this document.

2. Introduction

This document and its associated procedures support us in ensuring that working relationships with colleagues, stakeholders, partners, and customers do not conflict with our requirement to engage in business relationships in a legal, transparent, ethical, and responsible manner.

Active IQ recognises that conflicts of interest may arise that could lead to individuals making decisions, or appearing to make decisions, that are based on personal interest and not the interest of the organisation or what is ethically correct. Such conflicts of interest may also constitute a form of corruption and risk the organisation becoming non-compliant with our regulator's General Conditions of Recognition.

2.1. Purpose

This document outlines Active IQ's approach to identifying and managing conflicts relating to all Active IQ colleagues, suppliers, partners, contractors, and flexible workers. The document clearly outlines responsibilities for reporting and mitigating potential or actual conflicts, provides guidance for different departments across the organisation, and outlines how a conflict can be raised and recorded.

2.2. Scope

This policy applies to all individuals working for or on behalf of Active IQ, including all colleagues at all locations and at all levels including members of the Board, the Executive team, external contractors, agency workers, flexible workers, partners, suppliers, centres, customers, any associates, any subsidiaries or their employees or any other person associated with us (collectively referred to in this document as 'individuals').

This policy extends to all Active IQ's dealings and transactions in all countries in which it or its consultants, partners, stakeholders, associates, and all future companies operate.

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This document supports specific Awarding plus conflicts of interest procedures that relate to potential learner-centric conflicts, such as teaching and assessment delivery.

2.3. Responsibilities/duties

This policy sets out the responsibilities of all individuals, in line with their Statement of Terms & Conditions of Employment (or other contractual arrangement), in supporting us to meet the requirements set out in our regulators' General Conditions of Recognition.
Key stakeholders of this policy are responsible for ensuring that, where they are responsible for recording or monitoring conflicts, this policy is kept under review and followed where a potential or actual conflict is identified with support from relevant department(s).

2.4. Definitions

Word/Acronym	Definition
ARA	Audit, Risk and Assurance
BAU	Business as usual
Conflict of Interest	A situation in which an individual, or organisation, has, or may be perceived to have competing interests or loyalties which could lead to a potentially subjective, biased, or corrupt decision being made by that individual or organisation.
CRO	Chief Regulatory Officer
Individuals	Anybody working for or on behalf of Active IQ, including all colleagues at all locations and at all levels including members of the Board, the Executive team, external contractors, agency workers, flexible workers, partners, suppliers, centres, customers, any associates, any subsidiaries or their employees or any other person associated with us.
SLT	Senior Leadership team

2.5. Location

This document will be available via the Active IQ website.

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3. Conflicts of Interest guidelines

Assessing the risks to Active IQ arising from potential conflicts of interest is an integral part of Active IQ's overall risk management process. Identified conflicts of interest are mitigated as far as possible and are monitored as part of overall risk management and internal control processes.

Periodic reviews of our conflicts of interest policy and procedures are undertaken as part of our governance and accountability processes. All existing and reasonably foreseeable conflicts of interest will be identified and monitored by our organisation in line with this procedure and escalated to an Executive Member/Trustee where appropriate.

Documented conflicts of interest will be monitored closely, particularly during periods of change, to mitigate the possible impact of any potential Adverse Effect, as specified in our regulators' General Conditions of Recognition. Wider conflicts must also be considered where they relate to Active IQ, its subsidiaries, or its providers to ensure that the likelihood of fraud or wrongdoing is mitigated.

Unmanaged or undisclosed conflicts of interest can create risks of fraud or misuse of position. All individuals must act with integrity and declare any actual or potential conflicts promptly.

Declared interests will be reviewed and managed to protect the integrity of our decisions and prevent fraud. Where necessary, controls such as recusal or independent oversight will be applied.

This policy supports our compliance with Ofqual's Fraud Action Plan and the Economic Crime and Corporate Transparency Act 2023.

4. Role specific requirements

All individuals and organisations working with or on behalf of Active IQ must complete the appropriate Conflict of Interest (COI) declaration before entering into an agreement with Active IQ, or before starting any new activity under an existing agreement.

Where flexible workers are engaged, Active IQ will review declarations to identify any potential risks and agree appropriate actions to manage or mitigate those risks. This may include seeking additional guidance or escalating concerns where necessary.
All individuals and organisations are responsible for ensuring they understand and comply with this policy and any associated procedures. They must take reasonable steps to identify, declare, and appropriately manage any actual or potential conflicts of interest.

Specifically, as an Executive member, the CRO is responsible for escalating reports of actual or potential conflicts of interest to the Board, where such conflicts may be contrary to Active IQ Awarding's regulatory duties/interests and/or could have an impact on Active IQ's awarding regulatory status and relationships with our regulators, stakeholders, and customers.

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4.1. Quality assurance and assessment related roles

Quality Assurance and Assessment related roles apply to all individuals working for or on behalf of Active IQ, in the context of assessment, whereby they may be producing reviewing, marking, or conducting assessments.

The aim of the procedure is to provide assurance that the integrity of confidential assessment materials is being upheld and always protected. It extends to all Active IQ dealings and transactions in all countries in which it or its consultants, partners, stakeholders, and associates operate.

4.2. Our stakeholders (including centres, customers)

In line with our contractual agreements, including our Centre Agreement, we expect our stakeholders, centres, and customers

- To read and abide by the contents of this policy when preparing for quality assurance reviews.
- To adhere to any contractual arrangement, you may have with us in relation to conflicts of interest.
- To have a dedicated conflicts of interest policy and procedures which can be produced on request by our colleagues
- To fully adhere to those policies and procedures in the identification, minimisation and mitigation of risks relating to conflicts of interest.
- To declare any relevant conflicts within your centre to Active IQ
- To tell us when an incident of, or a significant risk incident of a conflict of interest that may adversely affect Active IQ has been identified.

This policy and supporting guidance for customers is available via the Active IQ website.

Stakeholders, including customers and centres, suppliers should report risks or instances of conflicts of interest as per the conditions set out in their contract and/or Terms of Agreement.

4.3. Independent suppliers/sole traders, contractors

In line with their contractual agreements, and as part of onboarding, we expect our contactors, independent suppliers and sole traders:

- read and abide by the contents of this policy

- adhere to any contractual arrangement, you may have with us in relation to conflicts of interest
- declare any relevant or potential conflicts to Active IQ
- tell us when an incident of, or a significant risk incident of a conflict of interest that may adversely affect Active IQ, has been identified.

5. Specific areas of conflict risk

Certain activities may pose a higher risk of conflict of interest. Centres, customers, and partners should take particular care to:

- Ensure individuals involved in assessment or quality assurance do not have competing personal or professional interests that could affect impartiality
- Avoid situations where individuals have access to confidential assessment materials and are also involved in delivery or training relating to the same qualification
- Ensure any external activities or relationships do not compromise the integrity of qualifications or services provided on behalf of Active IQ Specific areas for consideration regarding potential conflicts of interest

6. Where do I record my disclosure?

Centres are to contact Active IQ in the first instance for further support and guidance

7. How to contact us

If you have a concern or query about conflicts of interest, you can contact us via phone or email.

please contact our support team on:
E: csteam@activeiq.co.uk
T: +44(0)1480 467 950
T: +44(0) 845 688 1278

*To continue to improve our levels of customer service, telephone calls may be recorded for training and quality purposes.

Please see our Privacy Notice for further information on your rights and our responsibilities under the General Data Protection Regulation available on the website

8. References to associated documents

- Whistleblowing policy
- Anti-Bribery and corruption policy
- Centre agreement

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9. Implementation and dissemination

Implementation	Version 1.0 on Active IQ Website
Dissemination	Internal comms to be sent to all centres

10. Monitoring arrangements

This policy will be reviewed annually or earlier in the event of any significant legislative changes, organisational changes and any incidents of non-compliance or other circumstances highlighting emerging conflicts of interest risks.

Active IQ operates in line with this policy and maintains appropriate governance arrangements to ensure ongoing compliance.

11. Data retention

All data pertaining to a potential or actual conflict will be maintained for five years.

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