



## **Creative Claret Approved Programme Provider APP2192**

### **Conflict of Interest Policy**

#### **Introduction**

The Creative Claret is approved by WSET Awards which is subject to regulation by the UK Government's regulator, Ofqual. As a regulated awarding organisation, they are required to identify, monitor and manage all conflicts of interest which may have an adverse effect on the qualifications they offer and we must take all reasonable steps to mitigate such adverse effect where it exists.

This document offers guidance to all individuals engaged in activities undertaken on behalf of WSET Awards, (the awarding organisation of the Wine & Spirit Education Trust) which have potential to lead them to act contrary to the interests of WSET Awards in the development, delivery, assessment and award of its regulated qualifications.

It defines what is meant by conflict of interest, describes such conflict of interest in the context of working with WSET Awards, identifies those conflicts of interest that can be managed and are therefore acceptable and those that cannot be managed and are therefore unacceptable. It also gives examples of potential conflict of interest

#### **Scope of this policy**

This policy is applicable to all members of staff employed by the Wine & Spirit Education Trust in whatever capacity and to any individual acting on behalf of WSET Awards. This includes those involved in the development of WSET qualifications, question setting, marking of assessments, delivery of WSET programmes of study leading to WSET qualifications, marketing of WSET qualifications, production of study materials, examination papers, qualification certificates and all other associated resources and services.

It relates to WSET regulated qualifications offered in the United Kingdom and in international markets.

#### **Definition of conflict of interest**

Conflict of interest exists where an individual has interests or loyalties that could adversely influence their judgement, objectivity or loyalty to WSET Awards when conducting activities associated with our qualifications. These can arise in many different aspects of awarding organisation activity, such as:

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- An individual whose personal interests or loyalties conflict with their awarding organisation involvement
- An individual who receives remuneration for services that conflict with their awarding organisation involvement
- An individual whose acts put WSET Awards in a position of non-compliance with its regulatory responsibilities.

Whilst it would be impossible to give a definitive list of scenarios presenting potential for conflict of interest, the following have been identified resulting from WSET Awards' Risk Management review as being of primary significance. However, other scenarios will constitute conflict of interest, and we will take actions to redress any such instances that come to our attention other than by declaration from the individual concerned. Such actions may also include the imposition of sanctions, if deemed appropriate.

Specific examples of conflict of interest include the following:

- The undertaking of any assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned.
- The undertaking of any moderation of assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned..
- The tutoring of candidates by any individual involved in the assessment process.
- The undertaking of a WSET regulated qualification by any individual employed by an APP.
- The undertaking of a WSET regulated qualification by any individual employed by WSET Awards.
- The invigilation of a WSET regulated qualification by any individual involved in the delivery of training leading to the assessment.
- The delivery of "coaching sessions" to examination candidates by any individual involved in the assessment of candidate scripts or the authoring of examination questions.
- The employment by an APP of individuals engaged in the delivery of taught programmes or in the role of Internal Assessor in another APP

Some of these examples can be managed and are therefore acceptable. For example, the marking of tasting assessments by Level 3 Internal Assessors is ALWAYS verified by WSET Awards as they clearly have an interest in the results of the assessments of learners they have taught and this constitutes a conflict of interest, and our verification process mitigates this possibility. Similarly, where an employee of the WSET or one of its APPs undertakes a WSET qualification, we can put measures in place to maintain the integrity of the assessment, PROVIDED we are notified of this conflict of interest in advance of the assessment. However, it

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would be totally inappropriate for any individual involved in the authoring of examination questions or the compilation of examination papers to teach or coach learners under any circumstances as there are no options for us to mitigate the effect of this clear conflict of interest.

### **GUIDANCE ON HANDLING CONFLICT OF INTEREST**

Any individual engaged with WSET Awards in the provision of our regulated qualifications, as identified under the scope of this policy, is required to make a “Declaration of Interest” by informing WSET Awards of any potential conflict of interest. Certain individuals, such as those involved in the assessment process are also required to submit a signed declaration of “Non-disclosure”. It is essential that any conflict of interest is declared to WSET Awards immediately to ensure this does not compromise our status of compliance with our regulator, Ofqual. Any APP who fails to declare a potential conflict of interest is in breach of our criteria for approval, and sanctions may be applied to their approval status as a result of any such non-disclosure. WSET Awards has processes and procedures in place to manage actual or perceived conflict of interest. These include the exclusive involvement of WSET Awards staff in the creation of all assessment materials, moderation of all internal assessment conducted by the APP and moderation of all written examinations not marked by optical mark readers. There are of course many other instances of conflict of interest for which we do not have documented procedures in place. Such instances will be handled on an individual basis to ensure that the integrity of our assessments is not compromised.

### **ROLES, RESPONSIBILITIES AND PROCEDURES IN THE HANDLING OF ACTUAL OR PERCEIVED CONFLICT OF INTEREST**

The Director, WSET Awards and the Centre Co-ordinator and Quality Control Manager have responsibility for the day to day managing of conflicts of interest relating to functions of WSET Awards. The members of the Senior Management Team of the Wine and Spirit Education Trust have responsibility for the day to day managing of conflicts of interest relating to functions of the Wine and Spirit Education Trust’s functions as a whole.

It is the responsibility of all individuals engaged in the provision of WSET qualifications, in all and any capacity, to promptly report any potential for conflict of interest to the Centre Co-ordinator and Quality Control Manager at WSET Awards.

All instances of conflict of interest will be recorded in WSET Awards’ Incidents Register, including details of steps taken to mitigate any adverse effect resulting from such conflict of interest. The Director, WSET Awards is responsible for determining what action needs to be taken to mitigate any adverse effect and for deciding when and how matters relating to **actual**

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or potential conflict of interest should be escalated within the Wine & Spirit Education Trust, to the Board of Trustees or to the Regulator, Ofqual.

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