



# ABPI Conflict of Interest Policy

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**The Conflict of Interest Policy is reviewed biennially.**

Approved/reviewed by	
ABPI Director of Examinations May 2025	
Date of next review	May 2027

## Introduction

This policy sets out how the Association of the British Pharmaceutical Industry (ABPI) will prevent and address issues that arise from real or perceived conflicts of interest in the development, delivery and award of its qualifications and assessments. It is intended to support ABPI staff in determining when a potential conflict of interest may arise in activities in relation to its role as an examination centre.

Conflict of interest can arise in any one of a number of areas involved with delivery of ABPI qualifications and as such, this policy can should be read in conjunction with any ABPI exam policies and/or Exam Regulations pertaining to the area of interest, such as in applying Exam Access Arrangements or in applying Special Consideration.

## Scope of Policy

This policy applies to all accredited qualifications offered by the ABPI. This policy defines what is meant by conflict of

interest and how it will be managed as, and by, the examination centre.

It applies to:

- All ABPI employees
- Any contractors (in the event they are supporting exam operations in extreme circumstances such as long term absence of ABPI examinations team staff)

## Definition

Conflict of Interest: The Ofqual General Conditions of Recognition<sup>1</sup> describes a conflict of interest as existing “when an organisation or an individual has competing interests, which might impair its, or their, ability to make objective, unbiased decisions.”

A conflict of interest exists where:

- its interests in any activity undertaken by it, on its behalf, or by a member of the organisation have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications
- a person who is connected to the development, delivery or award of 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, or
- an informed and reasonable observer would conclude that either of these situations was the case.

Conflicts of interest can arise in a variety of circumstances - for example (the list is not exhaustive and is intended for guidance only):

- External quality assurance of the ABPI examination centre where the appointed External Quality Assurer (EQA) identifies as having been employed at any time within the last 3 years by the ABPI or of knowing personally/professionally, an in-flight, or recent (within last 3 years), learner.
- Where someone works for the ABPI, and has friends, relatives, personal/professional contacts taking ABPI qualifications.
- Where an internal verifier currently (or in the last 3 years) line manages an in-flight learner.

## **Responsibilities assisting identifying Conflicts of Interest**

This policy complies with the General Conditions of Recognition<sup>1</sup>, and requires the ABPI examination centre to establish, maintain, and at all times comply with, an up-to-date written conflict of interest policy, including procedures on intentions to comply with Ofqual requirements.

### **Centre Staff:**

All ABPI examinations employees have a responsibility to:

- Understand this policy as the centre's conflict of interest policy.
- Understand the implications of conflicts of interest when delivering, assessing and internally quality assuring ABPI qualifications.
- Notify the Head of Centre (Examinations Director) immediately of any actual or potential conflicts of interest that may arise, such as, though not limited to, being related to, or having previously worked with, an in-flight learner.

## **Head of Centre (Examinations Director or acting Examinations Director):**

In the event the Head of Centre (Examinations Director) has a conflict of interest, this should be addressed in the same way as is required of Centre Staff, albeit notifying the relevant ABPI Leadership Executive Director.

The Head of Centre has lead responsibility to:

- Ensure staff meet the terms of SFJ Awards centre approval requirements outlined in the Approved Centre Criteria and SFJ Awards' Centre Handbook.
- Ensure staff are familiar with this conflict of interest policy.
- Identify, manage and resolve any actual or potential conflicts of interest in delivery, assessment and internal quality assurance involving centre staff, that may arise.
- Take proactive steps to ascertain whether the accrediting body EQA has knowingly been employed at any time within the last 3 years by the ABPI, or by an employer of an in-flight learner, or whether the EQA is related to an in-flight learner.
- Maintain and monitor a Conflict of Interest Register (CoIR).
- Manage potential or actual conflicts of interest identified within the CoIR.
- Ensure 'Declarations of Interest' is a standard agenda item for all meetings of the Exam Governance Committee.

## **Accrediting body:**

- Review the ABPI CoIR at scheduled meetings / audits.
- Those acting on behalf of SFJ Awards must be free from an interest that could adversely influence their judgment, objectivity or loyalty to the organisation in conducting their activities.

- Must declare any actual or potential expressions of interest or conflicts of interest in relation to dealings with the ABPI qualifications.
- The SFJ Responsible Officer can:
  - Make the CoIR available to SFJ Awards' Quality & Standards Committee for monitoring purposes.
  - Make the CoIR available to the Qualifications Regulators for scrutiny, as requested.

## **Declaring Conflicts of Interest**

Conflicts of interest are recorded in a CoIR by the ABPI Examinations Director or appropriate Leadership Executive Director. The CoIR records the nature of the conflict, the potential adverse effect, the mitigating actions to be taken (which are determined on a case by case basis) and the timescales for these actions, together with any updates.

A consequence of a non-declared conflict of interest can result in an adverse effect, and is taken very seriously by the Examination Centre.

## **Managing Conflicts of Interest:**

### **External Quality Assurance:**

The ABPI qualification Ofqual regulated accrediting body, SFJ Awards, will re-allocate the ABPI examination centre where a conflict has been identified and will not allocate an External Quality Assurance (EQA) assessor to any centre where there may be a conflict of interest. Where an actual conflict of interest is identified by an EQA assessor, or Head of Centre, relating to an organisation to which the EQA is already connected, SFJ Awards will re-allocate the ABPI

examination centre to another suitable member of the EQA team.

As an examination centre accredited by SFJ Awards, the ABPI is committed to ensuring that all assessments are carried out with integrity. It is a condition of the ABPI examination centre approval that there is a process to identify, monitor and manage any conflicts of interest in assessment outcomes. The centre commits to taking all reasonable steps on a case by case basis, and in such a way that does not disadvantage a learner, or learners, to avoid any part of the assessment and subsequent quality assurance of a learner being undertaken by any person who has a personal interest in the outcome for that learner – this could include additional verbal checks during recruitment of new internal QAs.

Given the size of the ABPI examination centre, some roles are usually undertaken by the same person. However, the assessor role and the internal quality assurance role are always carried out separately. The assessor does not quality assure their own assessments as this presents a conflict of interest. Individuals should not be involved in the assessment or the quality assurance of assessment decisions in which they have a personal interest.

Any alteration to recorded achievement as a direct result of either internal, or in extreme cases external (accrediting body), quality assurance must be justified and documented. Where it is absolutely necessary that assessment or the quality assurance of assessment decisions is undertaken by someone with a personal interest, the assessment process (irrespective of whether an alteration to achievement is justified and documented) will be subject to scrutiny by those without personal interest.

Conflicts of interest are managed on a case by case basis and could involve simple measures to ensure that no adverse effect arises, such as seeking an independent opinion where a post exam alteration to an assessment outcome is identified and recommended as a result of standard quality assurance procedures.

Alternatively, it may also be that an activity can be managed differently so that the conflict of interest is avoided – for example, the Head of Centre personally overseeing assessment where a conflict of interest has been identified for a member of ABPI examination staff.

## **Adverse Effects**

For the purpose of this policy, an adverse effect is described as: “An act, omission, event, incident or circumstance if it:

- gives rise to prejudice to learners or potential learners, or
- adversely affects –
  - i. the ability of the awarding organisation to undertake award of qualifications in accordance with regulatory criteria
  - ii. the standards of qualifications which the awarding organisation makes available or proposes to make available or provide, or
  - iii. public confidence in qualifications.”

SFJ Awards, its associates/consultants and the ABPI as an approved examination centre involved in the development, delivery and award of qualifications, must take all reasonable steps to ensure that no conflict of interest which relates to it has any adverse effect. Where such a conflict of interest has had an adverse effect, SFJ Awards and/or the



ABPI examination centre or employed individuals, must take all reasonable steps to mitigate the adverse effect as far as possible and correct it.

SFJ Awards will promptly notify the Regulators and other relevant authorities, as appropriate when it has cause to believe that an event has occurred (or is likely to occur) which could have an adverse effect.

## **Review of the Policy:**

This policy will be reviewed by the ABPI biennially, or in the interim as required in response to lessons learnt, customer feedback, changes in legislation and guidance from the Qualifications Regulators.

If a learner has any queries about the content of the policy or wishes to give feedback, then please contact

[exams@abpi.org.uk](mailto:exams@abpi.org.uk)

Contact details for named roles above can be found in the ABPI Examination Regulations available here: [Exam Regulations](#)