
Conflict of Interest and Whistleblowing Policy

A2A Qualifications Limited

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Supersedes	All previous A2A Training conflict of interest and whistleblowing policies and procedures.
Applies to	A2A personnel, assessors and internal quality assurers; approved centres, training providers and employers; apprentices and learners; and any contracted third parties involved in assessment.

1. Purpose and scope

A2A Qualifications Limited (“A2A”) relies on the independence and impartiality of its assessment. This policy sets out how A2A identifies, declares and manages conflicts of interest, and how anyone connected with A2A can raise concerns about wrongdoing through whistleblowing. It is a clustered policy in two parts: Part A — Conflict of Interest, and Part B — Whistleblowing.

It applies to all apprenticeship assessment and to any regulated qualification activity A2A delivers, across A2A’s centre-assessed, partially centre-assessed and fully A2A-assessed delivery models. It applies to A2A personnel, assessors and internal quality assurers; approved centres, training providers and employers; apprentices and learners; and any contracted third parties involved in assessment.

2. Regulatory and policy context

A2A’s assessment is governed first by the published **assessment plan** for each apprenticeship standard (the version relating to the apprentice’s start date), and by **Ofqual’s recognition requirements** in the General Conditions of Recognition and associated guidance. The requirements most directly relevant to this policy are Condition A4 (Conflicts of Interest), the definition of “Conflict of Interest” in Condition J1, the role of the Responsible Officer under Condition B1, and Ofqual’s guidance on managing conflicts of interest in apprenticeship assessment.

Precedence. Where any A2A internal policy or procedure differs from the applicable assessment plan or Ofqual’s requirements, the assessment plan and Ofqual’s requirements take precedence.

Whistleblowing is supported in law by the Public Interest Disclosure Act 1998, which protects workers who make a qualifying disclosure in the public interest from suffering detriment. Ofqual is a prescribed person under that Act for matters relating to the regulation of qualifications and assessment.

For context, the occupational standards and assessment plans are owned by Skills England (which took over the former IfATE's functions on 1 June 2025); A2A is listed on the Apprenticeship Provider and Assessment Register (APAR) and is subject to external quality assurance; and responsibility for apprenticeships policy moved to the Department for Work and Pensions in September 2025. A2A handles personal data under the UK GDPR and the Data Protection Act 2018.

Part A – Conflict of Interest

3. What a conflict of interest means

A conflict of interest exists where competing interests have the potential to impair — or could be perceived by an informed and reasonable observer to impair — the ability of A2A or an individual to make objective, unbiased assessment decisions. Conflicts may be actual, potential or perceived, and may be financial or non-financial. They can arise at organisational level (for example, A2A's relationships with centres or any related company) or at individual level (for example, an assessor's personal or professional connection to an apprentice or employer).

4. Conflicts of interest in end-point assessment

Independence is fundamental to end-point assessment. In particular:

- Independent assessors must be independent of, and separate from, the training and on-programme delivery provided by the training provider or employer.
- An assessor must not assess an apprentice they have trained, coached, mentored, line-managed or previously assessed during the on-programme period.
- Internal quality assurers must be independent of the assessment decisions they sample.
- Where a resit or retake is required, it is undertaken or quality-assured by a different person from the original decision wherever possible, to avoid a conflict.
- A2A is alert to financial incentives that could influence judgement (for example, fee models linked to pass rates) and to reciprocal arrangements, where two organisations assess each other's apprentices. Such arrangements are avoided where possible and, where unavoidable, the assessment is scrutinised by another independent person.
- Conflicts at A2A's own governance level are identified and managed so that decisions about the development, delivery and award of assessment remain objective.

5. Identifying, declaring and managing conflicts

A2A identifies and monitors conflicts of interest on an ongoing basis. Everyone covered by this policy must declare any actual, potential or perceived conflict as soon as they become aware of it, and before undertaking any activity affected by it. Declarations are recorded in A2A's register of interests, maintained by the Responsible Officer.

A2A then takes reasonable steps to manage or mitigate the conflict — for example, reallocating the assessment to an unconflicted assessor, arranging independent scrutiny by another person, or removing the affected individual from the relevant decision. Where a conflict has had, or could have,

an adverse effect, A2A acts to mitigate it and notifies Ofqual where required. A2A will provide its conflict of interest policy to Ofqual on request.

6. Roles and responsibilities (conflicts of interest)

- **Responsible Officer** – accountable for this policy, for the register of interests, and for any related notifications to Ofqual.
- **Director and governance** – ensure conflicts at organisational level are identified and managed.
- **Assessors and internal quality assurers** – declare conflicts promptly and withdraw from any affected assessment.
- **Centres, training providers and employers** – declare conflicts and support A2A in managing them.

Part B – Whistleblowing

7. What whistleblowing covers

Whistleblowing is the raising of a concern about wrongdoing, risk or malpractice that affects others or the public interest — for example, a threat to the integrity of assessment, a breach of A2A's requirements or the law, a danger to health and safety, or an attempt to conceal any of these.

It is different from a personal complaint or an assessment appeal, which are dealt with under the Enquiries, Appeals and Complaints Policy. If a concern would be better handled as a complaint or appeal, it will be redirected; and a concern that qualifies as a public interest disclosure keeps its protection even if it is first raised as a complaint.

8. How to raise a concern

Anyone connected with A2A can raise a whistleblowing concern. Concerns should be raised promptly with the Responsible Officer at info@a2aqualifications.co.uk, with as much relevant information as possible. Where the concern involves the Responsible Officer or the Director, or where the person does not feel able to raise it internally, it may instead be raised with A2A's Compliance team (Sam Barnfield or Sarah Jacques). An independent external reporting route is also in place; its details are available on request. A concern may also be raised directly with Ofqual as a prescribed person.

A2A will protect the identity of the person raising a concern so far as it is able, unless it is legally required to disclose it. Anonymous concerns will still be considered, although they can be harder to investigate.

9. Protection for those who speak up

A2A will not tolerate any detriment, victimisation or disadvantage towards anyone who raises a genuine concern in good faith, even if it later proves to be mistaken.

Separately, the Public Interest Disclosure Act 1998 gives statutory protection to workers who make a protected disclosure — a qualifying disclosure made in the reasonable belief that it is in the public interest and substantially true. These rights apply from the first day of work and extend to many contractors and agency workers. A2A cannot itself confer the statutory protection of the Act — that

protection arises in law, including where a disclosure is made to a prescribed person such as Ofqual — but A2A’s own commitment to protect good-faith reporters from detriment applies regardless.

10. Raising a concern externally

A2A encourages concerns to be raised internally first so they can be addressed quickly. A worker may also make a disclosure to Ofqual as a prescribed person for matters relating to the regulation of qualifications and assessment, or to another prescribed person relevant to the concern. Disclosures to the media or the wider public attract statutory protection only in limited circumstances, and anyone considering this should take advice first.

11. Records, confidentiality and data protection

Declarations of interest and whistleblowing concerns are recorded and held securely for the required retention period, and handled under the UK GDPR and the Data Protection Act 2018. Information is shared only with those who need it to manage a conflict or investigate a concern, and with regulators where required. Special-category personal data is handled only where an appropriate lawful basis under UK GDPR Article 9 applies, and such matters are referred internally for data protection sign-off before they are processed. See the Data Protection / Privacy Policy.

12. Related documents

- Malpractice, Maladministration and Sanctions Policy (A2A-MMS-POL-002)
- Enquiries, Appeals and Complaints Policy (A2A-EAC-POL-001)
- Centre Assessment Standards Scrutiny (CASS) Policy
- Data Protection / Privacy Policy
- Reasonable Adjustments and Special Considerations Policy
- A2A Register of Interests

13. Version history

Version	Date	Owner	Summary of change
1.0	10 June 2026	Director	New clustered Conflict of Interest and Whistleblowing policy for A2A Qualifications. Sets out the conflict-of-interest definition and the independence requirements for end-point assessment; declaration and register-of-interests arrangements; and a whistleblowing route aligned to the Public Interest Disclosure Act 1998, with Ofqual as a prescribed person. House style and CASS model applied.