



Conflict of Interest Policy

National Talent Academy Limited

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2.0	February 2026	National Talent Academy	Redrafted to reflect TQUK endorsement; removed

			Ofqual GCR references; updated contact details and organisational structure
2.1	September 2026	National Talent Academy	Added a document control block recording the document owner, status, date published, next scheduled review and contact. Set the review frequency to annual. Replaced the stated record retention period with a reference to the NTA Data Retention Schedule. Corrected the description of certification: TQUK issues the certificate for the full Level 3 Award and NTA issues certificates for individual units, including the mandatory unit.
2.2	September 2026	National Talent Academy	Updated the name of the Equity, Diversity and Inclusion Policy in the list of related policies, following its renaming. No other change.

For use in National Talent Academy policy development

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1. Introduction

1.1 About National Talent Academy

National Talent Academy (NTA) is an educational technology company providing online qualifications in essential work skills for 16-to-19-year-olds and adult learners in Further Education colleges, schools and training providers across the UK.

NTA was founded in 2020 by Cambridge graduate David Jaffa, who previously founded SAM Learning (online GCSE/KS3 revision used in hundreds of UK schools) and Penda Learning (online science/maths for US schools, sold 2019). David received the 2021 BETT Outstanding Achievement Award for his lifetime achievements in EdTech.

1.2 Purpose of This Policy

A conflict of interest occurs when an individual or organisation is involved in multiple interests, one of which could possibly corrupt the motivation for an act in the other. This policy describes how potential conflicts of interest are identified and managed by NTA.

The purpose of this policy is to:

- Highlight and illustrate potential situations where conflicts of interest may arise.
- Identify the principles NTA will adopt in the management of conflicts of interest.
- Set out what actions should be taken by individuals who encounter conflicts of interest.
- Set out how NTA will manage identified conflicts of interest.

It is important to remember that conflicts of interest can be perceived, potential or actual.

1.3 Scope

Assessments must be independent, and that independence must be at both an organisational and assessor level, from design through to delivery. This policy covers:

- National Talent Academy as an organisation.
- Employees of NTA.
- Experts involved in the design of assessment tools.

- Assessors (and any invigilators, where applicable).
- Internal quality assurers at NTA.
- Delivery partners involved in assessment delivery, preparation and training.
- Learners.
- Those involved in panels at NTA associated with policies such as appeals, malpractice, complaints and sanctions.

This policy applies to the NTA Level 3 Award in Essential Work Skills, which is an unregulated qualification endorsed by Training Qualifications UK (TQUK) as a Certified Learning Course (CLC), as well as any other products and services provided by NTA. TQUK issues the certificate for the full Level 3 Award; NTA issues certificates for individual units, including the mandatory unit.

1.4 Review and Availability

NTA will review this policy annually as part of its self-assessment arrangements. Amendments may be made in response to feedback, best practice or guidance issued by TQUK or other external bodies. Copies are available on request at hello@nationaltalent.org or via www.nationaltalent.org.

2. Types of Conflict of Interest

Conflicts of interest can arise in a variety of circumstances. They can be potential, actual or perceived. The following table illustrates common types:

Type	Description
Organisational	Where NTA's interests in any activity have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications.
Financial	Where an individual or organisation may gain financially from their involvement, e.g. through shareholdings in competitor companies or financial incentives related to assessment outcomes.
Intellectual Property	Where an individual or organisation may gain an advantage from their involvement, e.g. a sector expert involved in designing assessment materials who also works with delivery partners delivering the same programme.
Personal	Where an assessor may be related to or close friends with a learner, may be working for multiple organisations, may have managed the learner or may have been involved in an

	element of the learner's training or education.
Viewpoints	Where a person involved in assessment expresses views that may be prejudicial, compromising the objectivity and independence of the assessment process.

It is the responsibility of all those within the scope of this policy to ensure they are familiar with it and the requirement to disclose any activity that has the potential to represent a conflict of interest.

The ultimate responsibility for the management of potential and actual conflicts of interest lies with the Director of National Talent Academy (David Jaffa, Founder).

3. Principles for Management

NTA will ensure that:

- Processes and procedures are in place that enable this policy to be enacted and managed.
- All conflicts of interest are reviewed fairly and objectively.
- Any involvement in advice, support or training provided by NTA does not conflict with the independence of NTA's assessment team and its processes.
- Contractual arrangements with contributors to assessment clearly set out obligations to declare and manage conflicts of interest.
- Anyone who has access to confidential assessment material is independent of the learner, their training and their delivery partner.
- All NTA staff declare any interest regarding friends or family taking NTA courses and associated assessments.
- The policy and processes associated with it are regularly reviewed for fitness for purpose.

4. Identifying and Recording Conflicts of Interest

4.1 NTA Staff (Including the Director)

All personnel, including staff and those involved in the development, delivery and quality assurance of assessments, are required upon appointment to complete a

Conflict of Interest Declaration (Appendix A). This must be kept current, and where conflicts of interest change, the Director must be notified.

4.2 Management Team

Management team members' potential conflicts of interest are monitored at management meetings. At each meeting, members are requested to declare any potential conflict of interest with regard to agenda items.

4.3 Assessment Developers and Assessors

Those involved in the development of assessment tools and/or appointed as assessors are required to declare any conflict of interest. This requirement is written into their contract. Independent assessors are required to be totally independent of those they are assessing.

4.4 NTA Panels

All personnel involved in panels associated with policies such as appeals, malpractice, complaints and sanctions are required to declare any conflict of interest prior to undertaking any such activity.

5. Mitigating and Managing Conflicts of Interest

5.1 How Declarations Are Considered

All received declarations of conflict of interest will be logged. Declarations will be considered monthly by the relevant team in consultation with the Director, and one of the following outcomes will be agreed:

Outcome	Description
Approved – no effect	Activity is approved because the conflict of interest has no effect on the outcome.
Approved with mitigation	Activity is approved with mitigation in place to address adverse effects (e.g. arranging for assessment to be scrutinised by another person).
Not approved	Activity is not approved and an alternative approach is taken.
Further information requested	Additional information is required before a decision can be made.

5.2 Management Approaches

There are various ways in which conflicts of interest may be managed, depending on the nature of the conflict. In most cases, simple measures will be sufficient.

Management may include:

- Assignment to a different role.
- Substitution by another staff member for selected activities.
- Scrutiny of activity by another staff member.
- Rotation of assessment instruments.
- Standards maintenance and external scrutiny.
- Internal scrutiny through standardisation activities.
- In extreme circumstances where the conflict is fundamental and unmanageable, preventing an individual from undertaking specific activities.

Where a person with a personal interest plays a role in assessment, the relevant part of the assessment must be subject to scrutiny by another person. If the expertise is so specialist that standard controls are insufficient, NTA will contract external expertise to provide appropriate scrutiny.

5.3 NTA Platform Context

The NTA platform delivers all programme content and assessments fully online, with an automatic evidence trail captured for internal and external quality assurance purposes. This digital audit trail supports the identification and management of conflicts of interest by providing transparent, auditable records of assessment activities and decisions.

5.4 Financial Conflicts

NTA recognises the potential for financial incentives to influence assessment outcomes. Tracking is in place to ensure this is monitored and controlled, along with internal scrutiny. Should any such conflict be suspected, NTA's Malpractice and Maladministration Policy will be applied, along with staff contractual and disciplinary procedures.

6. Actions to Be Taken by Delivery Partners

Delivery partners must:

- Identify potential conflicts of interest, including situations where both training delivery and assessment roles sit within one organisation, or where an individual has competing personal and professional interests.
- Attend conflict of interest training provided by NTA and maintain a programme of staff awareness activities.
- Actively and routinely review staff and governance roles to assess the likelihood of conflicts of interest.
- Issue all relevant staff with a Conflict of Interest Declaration form (Appendix A or an equivalent delivery partner form) on commencement of the agreement with NTA.
- Transfer all information from declaration forms to a register of interests maintained by a designated person at the delivery partner, which must be available for review by NTA.
- Update the register when changes to declared circumstances arise and notify NTA.
- Evaluate declared interests, identify if further action is required, document the approach taken and inform NTA.
- Keep all records relating to the identification, recording and management of conflicts of interest for the period set out in the NTA Data Retention Schedule.

7. Confidentiality of Assessment Materials

All staff involved in the creation, assessment and quality assurance of NTA qualifications must maintain complete security and confidentiality of assessment materials at all times. This requirement extends to a period of two years following termination of employment or contract.

Any information or materials that assessment writers, reviewers or markers have access to as a result of work carried out on behalf of NTA must be kept confidential at all times, for an indefinite period.

Any training delivered about confidential assessments will only use materials that are not and will not be used for any live assessment. Training to delivery partners about confidential assessments will not be delivered by any person involved in the development of those assessments.

8. Reviewing Conflicts of Interest

NTA operates a regular review process for conflicts of interest. This will include, as a minimum, a review per cohort for assessors and each time a new delivery partner is engaged. The review process is conducted by the quality assurance team in consultation with the Director.

9. Related Policies

This policy should be read in conjunction with the following NTA policies:

- Malpractice and Maladministration Policy.
- Enquiries and Appeals Policy.
- Sanctions Policy.
- Complaints Policy.
- Internal Quality Assurance Procedure.
- Equity, Diversity and Inclusion Policy.

10. Contact Information

If you have any queries about the contents of this policy, please contact National Talent Academy:

Email: hello@nationaltalent.org

Website: www.nationaltalent.org

Address: 3rd Floor, 1 Ashley Road, Altrincham, Cheshire, WA14 2DT

Appendix A: Conflict of Interest Declaration

Actual, potential or perceived conflicts of interest could arise from any of the following (this list is not exhaustive – please indicate any possible interest that you may have):

- Previous or current employment at a delivery partner as a tutor or programme manager.
- Appointment to a board, committee, tribunal panel, etc. of NTA.
- Membership of a professional body with an interest in the development, delivery or award of qualifications.
- Contractual relationship with NTA (e.g. consultants).
- Personal or professional relationship with a learner who is undertaking an NTA qualification.

Section 1: Personal Details

Full name:

Job role:

Delivery partner name (if applicable):

Address:

Telephone number:

Email address:

Section 2: Nil Return

I have read and understood the Conflict of Interest Policy and do not have a conflict of interest.

Tick here: ☐

Section 3: Declaration

If you do have a conflict of interest to declare, please provide the following information:

- The type of interest.
- The nature of the interest.
- A description of all parties involved (financial or non-financial) and any other relevant information.

Declaration:

In the case of assessment activities:

I declare that I will not assess, invigilate or internally verify any learner or their assessments until I have been given approval against the above conflict of interest by NTA.

Signature:

Date:

For Internal Use

Action taken:

Signed (NTA):

Date:

Please return this form to: hello@nationaltalent.org

Appendix B: Change in Circumstance Declaration

Individuals remain under a continuing obligation to declare conflicts of interest as they arise. If circumstances change after completion of the initial declaration, or a new situation arises, all information must be promptly disclosed to NTA.

Section 1: Personal Details

Full name:

Job role:

Delivery partner name (if applicable):

Email address:

Section 2: Declaration of Change

Please provide:

- The type of interest.
- The nature of the interest.
- A description of all parties involved and any other relevant information.

Declaration:

I acknowledge that the above interests exist and to the best of my knowledge have informed NTA of all the information regarding the change in circumstance.

In the case of assessment activities: I declare that I will not assess, invigilate or internally verify any learner or their assessments until I have been given approval against the above conflict of interest by NTA.

Signature:

Date:

For Internal Use

Action taken:

Signed (NTA):

Date:

Please return this form to: hello@nationaltalent.org