

## **Conflict of Interest Policy**

### **Policy:**

Cograpes, in its capacity as an Approved Program Provider (APP) for WSET, will identify, report to WSET, monitor and manage all conflicts of interest which may have an adverse effect on the WSET programs and qualifications offered. Cograpes will take all reasonable steps to prevent and/or mitigate such adverse effect where it exists.

### **Introduction:**

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

This document 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:**

This policy is applicable to all members of Cograpes staff involved in delivery, administration and/or marketing of WSET programs of study leading to WSET qualification, or Cograpes staff acting in any other capacity on behalf of WSET.

This policy may also apply in particular to employees, or family members of employees, of Cograpes undertaking study of WSET programs delivered by Cograpes and leading to WSET qualification.

This policy should be considered in instances of both actual and perceived Conflict of Interest.

### **Definitions:**

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

- An individual whose personal interests or loyalties conflict with their WSET

involvement

- An individual who receives remuneration for services that conflict with their WSET

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' Risk Management review as being of primary significance.

However, other scenarios will constitute conflict of interest, and the WSET will take actions to redress any such instances that come to their 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 Cograpes.
- the undertaking of a WSET regulated qualification by any individual employed by WSET.
- 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 Cograpes of individuals engaged in the delivery of taught programs 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 the WSET's verification process mitigates this possibility.

Similarly, where an employee of the WSET or one of its APPs undertakes a WSET qualification, the WSET can put measures in place to maintain the integrity of the assessment, provided notification is made of this conflict of interest in advance of the assessment.

However, it 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 the WSET to mitigate the effect of this clear conflict of interest.

### **Guidance on handling conflict of interest:**

Any individual engaged with WSET in the provision of WSET regulated qualifications, as identified under the scope of this policy, is required to make a "Declaration of Interest" by informing WSET 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 immediately to ensure this does not compromise WSET's status of compliance with their Regulator, Ofqual (UK).

If Cograpes were to fail to declare a potential conflict of interest, this would be a breach of the WSET criteria for approval, and sanctions may be applied to Cograpes' approval status as a result of any such non-disclosure. WSET has processes and procedures in place to manage actual or perceived conflict of interest.

These include the exclusive involvement of WSET staff in the creation of all assessment materials, moderation of all internal assessment conducted by Cograpes, 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 the WSET do not have documented procedures in place. Such instances will be handled on an individual basis to ensure that the integrity of WSET assessments is not compromised.

### **Responsibilities:**

#### **Cograpes Responsibilities:**

Cograpes, as an APP engaged in the provision of WSET qualifications, will promptly report any potential for conflict of interest to the Centre Coordinator and Quality Control Manager at WSET Awards.

Individuals involved in teaching or assessing WSET programs will submit all declarations required under this policy to WSET and will inform WSET promptly of any change to their situation and potential conflict of interest.

Cograpes will ensure this Conflict of Interest policy is available to all candidates. Where a potential or perceived conflict of interest exists for a Candidate, Cograpes will advise the candidate to contact WSET for further clarification and guidance.

**WSET Responsibilities:**

The Director, WSET and the Centre Co-coordinator 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.

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 or potential conflict of interest should be escalated within the Wine & Spirit Education Trust.