

Conflict of Interest Policy



BHS Qualifications (BHSQ) is committed to making sure all its activities are conducted safely, fairly, transparently and objectively. Arrangements for the effective management of conflict of interests are integral to this. A conflict of interest is a situation where a person and/or organisation benefits from actions or decisions made in an official capacity.

This document will:

- Define what is meant by conflict of interest, providing examples of potential conflicts.
- Explain BHSQ's approach to managing and recording conflicts of interest.
- Detail how BHSQ and approved centres manage conflicts of interest.

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Definition

A conflict of interest is where a person's professional duty and/or personal interest could be compromised.

This can be direct or indirect/perceived. Direct conflicts of interest are relatively easy to identify and include aspects such as an external verifier making verification decisions about an assessor they are friends with. Indirect or perceived conflicts of interest are more challenging and often more to do with perceptions. For example, a member of the BHSQ Board supporting a decision that assists a centre where they have provided a short training programme at three years previously.

Conflicts of interest can arise in a variety of situations and are likely to happen from time to time. Having a conflict of interest doesn't mean there is anything wrong, but that effective arrangements need to be in place to ensure any conflict of interest is managed appropriately.

BHSQ's approach to managing and recording conflicts of interest

As an awarding organisation BHSQ needs to ensure that conflicts of interest are managed effectively so that the certification of BHSQ qualifications is secure. In other words, no learner is advantaged or disadvantaged by who they know and that all certificates are achieved on the merit of the individual.

To do this, BHSQ will:

- Contact persons performing services on behalf of BHSQ annually to request that they submit an updated conflict of interest declaration form.
- Require conflicts of interest to be reported where appropriate.
- Record conflicts of interest.
- Take mitigating action where concerns or risks are identified.
- Analyse conflicts of interest to identify trends and then providing interventions to minimise these.

Identifying and managing conflicts of interest

This policy applies, but is not limited to employees, board directors, external associates, subject experts, and approved centres. As a consequence all have a responsibility to manage conflicts of interest effectively.

If a conflict of interest is identified by an individual, they will need to report this and then decide an appropriate course of action to minimise it, with whomever they are reporting it to. This may differ depending on the conflict and the circumstances. For example a conflict of interest involving BHSQ will be reported to and recorded by BHSQ, however a conflict of interest between an assessor and a learner would be reported to and managed by the approved centre.

Common types of conflicts of interest may include financial, political, current, or previous work, employment or other unpaid activities, membership of organisations and/or societies.

Examples of conflicts of interest can be found in Appendix 1.

Conflict of interests and working with BHSQ

If a conflict of interest is identified prior to any work being undertaken with BHSQ then this must be disclosed by completing and submitting the appropriate form. If the conflict of interest is **not** known prior to starting work with BHSQ then the form must be completed as soon as possible. In this situation BHSQ will identify any adverse effect arising from the conflict and take all reasonable steps to mitigate the effect.

All declarations of conflicts of interest will be reviewed when they occur and/or when they are notified to BHSQ and recorded on the *Conflict of Interest Register*. Where a declaration is made:

- BHSQ will assess the declaration, evaluate the impact, if any and identify the steps to be taken to manage the conflict of interest effectively
- In the rare event the identified conflict of interest cannot be managed effectively the conflict of interest will be escalated to the Chair of the BHSQ Board of Directors to determine when and how matters relating to the conflict of interest should be managed.

Conflicts of interest will be systematically recorded and reviewed on an annual basis by BHSQ. This will inform actions to reduce future conflicts of interest.

Conflict of interests and BHSQ approved centres

The approved centre will decide how best to manage conflicts of interest. This will be discussed as part of the BHSQ centre monitoring process. All approved centres are required to have a fully implemented policy in place.

Approved centres will complete an annual update. This identifies conflicts of interest and how they were managed and recorded. The results of the annual update will be recorded in the conflicts of interest register and will allow BHSQ to scope any further support or management or intervene where necessary.

If an approved centre finds that a conflict of interest has taken place and this is a threat to the accurate certification of a learner, they must inform BHSQ immediately.

Monitoring and review

This document and its content will be reviewed on a three-year cycle, or earlier should it be needed to ensure it remains fit for purpose and reflects the types of conflicts of interest that have arisen.

Date for review: August 2024

Document history

Version	Revision date	Reason
3	12/08/2021	To revise and replace previously produced document

Please note: This document is uncontrolled once printed. Please check with BHSQ for the most up to date version.

Appendix 1 – Conflicts of interest

The following are examples of conflicts of interest.

	Potential conflict of interest	Title of conflict	Action for mitigation
1.	A person working for BHSQ as an external verifier also works for the same BHSQ approved centre as a tutor, assessor and/or an internal verifier.	Current work/employment/unpaid activities	The person concerned will not be permitted to perform external verification activities for any centre they are connected to.
2.	A member of BHSQ's Board of Directors serves on the Board of Directors or a Board of Trustees of an BHSQ Approved Centre or an BHSQ competitor.	Political interests	The person concerned will be asked to be absent from any part of the meeting where the centre or its competitors are discussed.
3.	A person connected, or previously connected, to BHSQ discloses information about assessment or the content of any associated assessment materials where that information is (or is said or implied to be) confidential.	Past work/employment/unpaid activities	BHSQ requires all persons connected to the development of assessment content or materials to sign a non-disclosure agreement.
4.	The decision regarding the assessment of a learner, that contributes to the outcome of the qualification they are undertaking, is made by an BHSQ external verifier who has a personal/professional or familial relationship with that learner or that learner's family.	Interests of family and close associates	The person concerned will be replaced with another suitable external verifier. If the event cannot be avoided, arrangements will be made for another suitably qualified person to scrutinise the relevant part(s) of the assessment concerned.
6.	A member of BHSQ's Board of Directors accepts fees and provides advice to another awarding organisation that is in direct competition with the products and associated services of BHSQ.	Financial interests	The Director concerned would declare the interest and it would be the discretion of the Chair as to whether that Director participates in or leaves the room for discussions relating to the conflict.
7.	A member of BHSQ's Board of Directors owns a substantial share of a BHSQ vendor and is in a position to steer BHSQ business towards that vendor.	Financial interests	The Director concerned will be asked to withdraw from decision making.