

Conflict of Interest Policy



BHS Qualifications (BHSQ) is committed to making sure all its activities are conducted fairly, transparently and objectively. Arrangements for the effective management of conflict of interests are integral to this.

This document will:

- Define what is meant by conflict of interest
- BHSQ's approach to managing and recording conflicts of interest
- Identify conflicts of interest
- Detail how to effectively manage conflicts of interest.

A copy of this document can be downloaded from the BHSQ website or requested from the BHSQ Quality and Operations team.

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Definition

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

A conflict of interest can be direct or indirect/perceived. Direct conflicts of interest are relatively easy to identify and include aspects such as an assessor making assessment decisions about a family member. Indirect or perceived conflicts of interest are more challenging and often more to do with perceptions. These still require reporting and may not require any action other than recording. More examples of conflicts of interest can be found in Appendix 1.

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, family and close associates.

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 by who they know and that all certificates are achieved on the merit of the individual.

To do this, BHSQ will:

- Obtain completed conflict of interest declaration forms, from persons contracted to and performing services on behalf of BHSQ
- Contact all persons contracted to and performing services on behalf of BHSQ annually to request that they submit an updated conflict of interest declaration form
- Maintain, review and analyse a register to record conflicts of interest and take action where concerns or risks are identified.

These processes are managed by the BHSQ Quality and Operations team with oversight by the Responsible Officer.

Identifying and managing conflicts of interest

This policy applies, but is not limited to employees, board directors, external associates, subject experts, approved centres, tutors, assessors and internal quality verifiers, and as a consequence all have a responsibility to report and record any conflicts of interest as soon as possible and then to manage them 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.

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 *Conflict of Interest Declaration Form*. If the conflict of interest is **not** known prior to starting work with BHSQ then the *Conflict of Interest Declaration 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 as far as possible and correct it.

Conflicts of interest will be systematically recorded and reviewed on an annual basis by the Head of BHSQ. This will be the case for BHSQ employees, approved centres, any external contractors or consultants and the board of directors.

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 Head of BHSQ who will undertake an investigation. The Head of BHSQ will determine when and how matters relating to the conflict of interest should be managed or reported to the Board of Directors.

If a situation changes and existing disclosures may no longer be accurate or complete, then a new *Conflict of Interest Declaration Form* must be completed.

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 review and monitoring process and all approved centres are required to have a fully implemented policy in place. Training and support about conflicts of interest is offered by BHSQ as part of the assessor, internal verifier and approved centre standardisation and training activities.

BHSQ will conduct an annual audit of approved centres by asking all approved centre's to complete an annual update and change of circumstances form, this asks for the number of conflicts of interest and how they were managed and recorded. The results of the audit 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 on an BHSQ qualification they will need to inform BHSQ of this immediately. BHSQ's malpractice and maladministration policy will offer more details about this.

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.

Document history

Version	Revision date	Reason
2	14/03/2018	Revision of previous conflicts of interest policy (08/02/2017) to enhance regulatory compliance

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

Appendix 1 – Potential conflicts of interest

The following are examples of conflicts of interest.

	Potential conflict of interest	Title of conflict	Action for mitigation	Person responsible
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	BHSQ Quality and Operations Team
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	BHSQ Chair
3.	A person connected, or previously connected, to BHSQ offers to disclose information about any 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	Head of BHSQ
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 close personal 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	BHSQ Quality and Operations Team
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	BHSQ Chair
7.	A member of BHSQ's Board of Directors owns a substantial share of an BHSQ vendor and is in a position to steer BHSQ business towards that vendor		The Director concerned will be asked to withdraw from decision making	BHSQ Chair
8.	An assessor has a close personal or familial relationship with a learner or that learner's family	Interests of family	The approved centre will manage the assessment process to ensure that the learner is not advantaged or disadvantaged at any point. This will be discussed at centre review.	Approved centre main contact

Conflict of Interest Declaration

Full name:	
Role(s):	
Address:	
Telephone number:	
Email address:	

Information for declaration must include:

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

Declaration:

I acknowledge that the above interests exist and that I will inform BHSQ in the event that there is any change in my circumstances.

Signature:	
Date:	

Please return to BHS Qualifications, Abbey Park, Stareton, Kenilworth, Warwickshire, CV8 2XZ

For Office use:

Action taken:	
Internal reference:	
Date recorded:	
Date communicated to the individual:	