



**BBE**  
TRAINING



A CITRUS GROUP  
COMPANY

# Conflict of Interest Policy

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## Purpose

This policy applies to all BBE Training, Citrus Group employees and Contracted staff. This policy sets out guidelines and procedures for identifying, monitoring and managing actual and potential conflicts of interest.

## Introduction

The overriding aim of BBE, as a Training Provider, is to offer qualifications. BBE designs qualifications and assessment instruments and ensures that quality assurance systems are in place.

Key stakeholders are involved in a variety of activities and have a range of functions. BBE recognises that these key stakeholders, and the individuals who work for them, will be keen to maintain the integrity of the BBE qualifications as well as their own integrity. The policy aims to reflect this.

More importantly, when a conflict or potential conflict is identified by anyone working to award BBE qualifications, attention should be drawn to it. Individuals should always disclose an activity if they are in doubt about whether it represents a conflict of interest.

## Scope

This policy applies to all key stakeholders engaged with the BBE Qualifications and any person who can influence the outcomes. This includes Employers, BBE Centres, Citrus Group Centres, Contractors, Awarding Body employees, Business Development Managers and all members of the Governing body (Compliance Committee).



## Recognising Conflicts

On appointment, all Awarding Body employees and contractors are required to complete a declaration of interest form.

BBE acknowledges that it is not always possible to pre-empt when a conflict of interest is likely to arise and this policy is not designed to cover every eventuality. Generally, there will be a conflict of interest, if an individual's interest and/or loyalties conflict with those of the BBE strategy for developing fit-for-purpose qualifications.

Conflicts of interest can occur in a number of ways and from a variety of situations. For example, if, for any reason:

- BBE favours one Centre above another
- a Lead Moderator/Moderator/Marker are moderating/marketing a family member
- a Moderator/Marker are moderating/marketing papers from a centre where they have an interest i.e owner, deliver, assessor and/or IQA
- involvement in the preparation of learning resources



# Conflict of Interest Policy continued

## Interests in assessment

BBE will take all reasonable steps to avoid any part of the assessment of a Learner (including Moderation) being undertaken by any person who has a personal interest in the result of the assessment. Where, having taken all such reasonable steps, an assessment by such a person cannot be avoided, BBE will make arrangements for the relevant part of the assessment to be subject to scrutiny by another person.

BBE requires all staff and contractors to declare any involvement in the preparation of any resource or learning materials designed to support learners, or likely learners, in the assessment of any qualification for which they are under contract. Any such declarations will be carefully monitored to ensure that those assessments are not compromised.

## Minimising and Preventing Conflicts

BBE sees one of its functions as facilitating the process of qualification design by focusing on their responsibilities. In particular:

- providing and facilitating open dialogue with all BBE Centres
- not creating unreasonable barriers to any learners and approved centres wishing to operate
- not favouring a particular approved centre, to avoid them gaining a competitive advantage
- avoiding arrangements that might reduce competition or create exclusive arrangements
- avoiding practices that could be construed as anti-competitive or restrictive practice
- providing all approved centres with equal access to its services, information, meetings and processes.

Although this list is not exhaustive, it is felt that by adhering to the principles of neutrality, openness and fairness, conflicts can be avoided or managed without compromising the integrity of an individual or BBE.

## Responsibilities

It is the responsibility of all persons, when involved in the development, delivery, assessment and awarding of BBE qualifications and other associated activities to:

- conduct their activities so that BBE maintain a high standard to its Quality Assurance
- ensure that they make their role clear and separate this from their other functions, as far as is possible
- monitor their activities, so as to maintain the integrity of BBE
- devote enough time and intellectual ability to their specific responsibilities
- recognise and report any potential or existing conflict

The possibility of a conflict or potential conflict may be declared by any key stakeholder as an entity, or an individual.

## Managing Conflicts

In most cases, it is envisaged that simple measures will be enough to manage conflicts of interest. It may be that the activity can be managed differently so that conflicts of interest are avoided. In other cases, a simple undertaking by an individual to prioritise the interests of BBE will be all that is required. Only in extreme circumstances where the conflict of interest may be so fundamental and unmanageable, will an individual be prevented from undertaking specific activities.

## Monitoring the Policy

The policy and procedures will be reviewed yearly, to ensure that it is fit for purpose and that it reflects the types of conflicts that may arise, and how those conflicts are managed.

## Recording Procedure

All stakeholders must complete the BBE Conflict of Interest declaration form on an annual basis, for BBE to update their Conflict of Interest Register.

