

Policy statement

The purpose of this policy is to:

- Highlight and illustrate potential situations where conflicts of interest may arise.
- Identify the principles that The Blackford Centre 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 we will manage identified conflicts of interest.

Introduction

The overriding aim of The Blackford Centre as a training provider is to ensure a set of units of Assessment and Internal Quality Assurance that meet the needs of learners and the awarding body requirements. Key stakeholders are involved in a variety of activities and have a range of functions.

The Blackford Centre recognises that these key stakeholders, and the individuals who work for them, will be keen to maintain the integrity of the qualification as well as their own integrity. The policy aims to reflect this.

When a conflict or potential conflict is identified by anyone working to assess a learner then the Centre's 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.

Relevance

This policy is relevant to all key stakeholders engaged in the implementation, assessment and quality assurance of the qualifications. This includes employers, awarding organisations, learning providers, contractors and staff.

Recognising Conflicts

A conflict of interest is where an individual or organisation has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances and it is likely

that people working with or for us may encounter potential conflicts of interest from time to time.

Examples include:

- Where someone has a position of authority in one organisation which conflicts with their interests in another organisation.
- Where someone has personal interests that conflict with their professional position.
- Where someone works for us or carries out work on our behalf, but who may have paid or unpaid personal interests in another business which uses our products or services or reduces related products/services.
- Where someone works for or carries out work on our behalf that has friends or relatives taking our assessments or examinations.
- Where there is a conflict between income and regulatory responsibilities.
- Where training and delivery and awarding rest within one umbrella organisation.
- Where a tutor/assessor personally knows the learner.
- Where tutor/assessor knows another tutor/assessor whom they will be working with as part of the moderation and verification process.

It is the responsibility of all staff to ensure that they are familiar with this Conflict of Interest Policy and the requirement to disclose any activity that has the potential to represent a conflict of interest.

The ultimate responsibility of the management of potential and actual conflicts of interest lies with the CEO.

The Blackford Centre 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 Blackford Centre and those of the awarding body represented.

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

- One learner is favoured above another.
- There is not account taken of the broad needs of the learner as set out in the awarding bodies guidance/requirements.
- An assessor/verifier works for multiple stakeholders and has difficulty being impartial.
- A conflict arises between the learner, assessor, internal quality assurance or awarding body.

Minimising and Preventing Conflicts

The Blackford Centre will reduce the risks caused by conflict of interest by:

- Providing and facilitating open dialogue with all stakeholders.
- Not creating unreasonable barriers to any learners wishing to study with us.
- Not favouring a qualification or level, 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 the learner or key stakeholder with objective advice on the viability of qualifications and availability of qualifications for the needs of the sector.
- Providing all learners and stakeholders with equal access to its services, information, meetings, staff and processes.
- Enabling open and frank dialogue between learner and stakeholders.

By adhering to the principles of neutrality, openness and fairness, conflicts can be avoided or managed without compromising the integrity of the Blackford Centre or the individual or organisation concerned.

Responsibilities

It is the responsibility of all persons, when involved in the assessment of qualifications, internal quality assurance and other associated activities that meet The Blackford Centre assessment strategy, to:

- Ensure that they make their role clear and separate this from their other functions, as far as is possible.
- Monitor their activities, to maintain the integrity of the assessment.
- Devote enough time and intellectual ability to their specific responsibilities.
- Recognise and report any potential or existing conflict.

Every individual or entity must declare any conflict or possibility of a conflict.

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 The Blackford Centre and the awarding body 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.

Conflict of Interest Procedure

The procedure for reporting and managing potential or existing conflicts is as follows:

1. Declare Interest

Individual or key stakeholder to declare identified potential or actual conflict. Please complete the declaration form at the end of this policy.

2. Resolution of Conflict:

A group discussion should take place. The purpose of the discussion is to reach a decision about how the conflict will be managed. At least three people should be involved at this stage.

The circumstances of the disclosure will dictate who is involved in the discussion. Generally, the discussion will take place between the CEO, programme leader and internal quality assurance, unless involved, or close to the disclosure. In this case, another member of senior management will make the decision about who should hold the discussion.

It may, for example, be more appropriate for individuals working outside the curriculum team to undertake this role. The individual raising the possibility of a conflict will also take part in the discussion, if this is appropriate.

3. Decision

Normally it will be sufficient to:

- gain an undertaking from the individual or key stakeholder to conduct their responsibilities so that the integrity of the centre is maintained, as well as their own integrity
- reorganise activities and/or key functions so that the conflict is mitigated.

If neither of the above steps is possible, another solution must be agreed by the discussion group. The solution should be in proportion to the nature of the conflict; in extreme circumstances, activities may need to be monitored or even restricted. The decision about how the conflict is managed is final.

4. Log Conflict and Resolution

A declaration of interest form is provided for this purpose.

5. Monitor and Review Decisions and Actions

The log should be reviewed from time to time to ensure that actions forming part of the resolution have been implemented

Assessor conflict of Interest Declaration Form

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

- Where someone has a position of authority in one organisation which conflicts with their interests in another organisation.
- Where someone has personal interests that conflict with their professional position.
- Where someone works for us or carries out work on our behalf, but who may have paid or unpaid personal interests in another business which uses our products or services or reduces related products/services.
- Where someone works for or carries out work on our behalf who has friends or relatives taking our assessments or examinations.
- Where there is a conflict between income and regulatory responsibilities.
- Where training and delivery and awarding rest within one umbrella organisation.
- Where a tutor/assessor personally knows the learner.
- Where tutor/assessor knows another tutor/assessor whom they will be working with as part of the moderation and verification process.

Full Name	
Job Role	
Centre Name	
Centre Number	
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 (financial or non- financial) and any other relevant information.

Declaration

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

Signed:..... Date:.....



Conflict of Interest log

Date	Name and role of person raising an issue	Nature of Conflict Identified	Discussion (including name of those involved)	Resolution



Date	Name and role of person raising an issue	Nature of Conflict Identified	Discussion (including name of those involved)	Resolution

