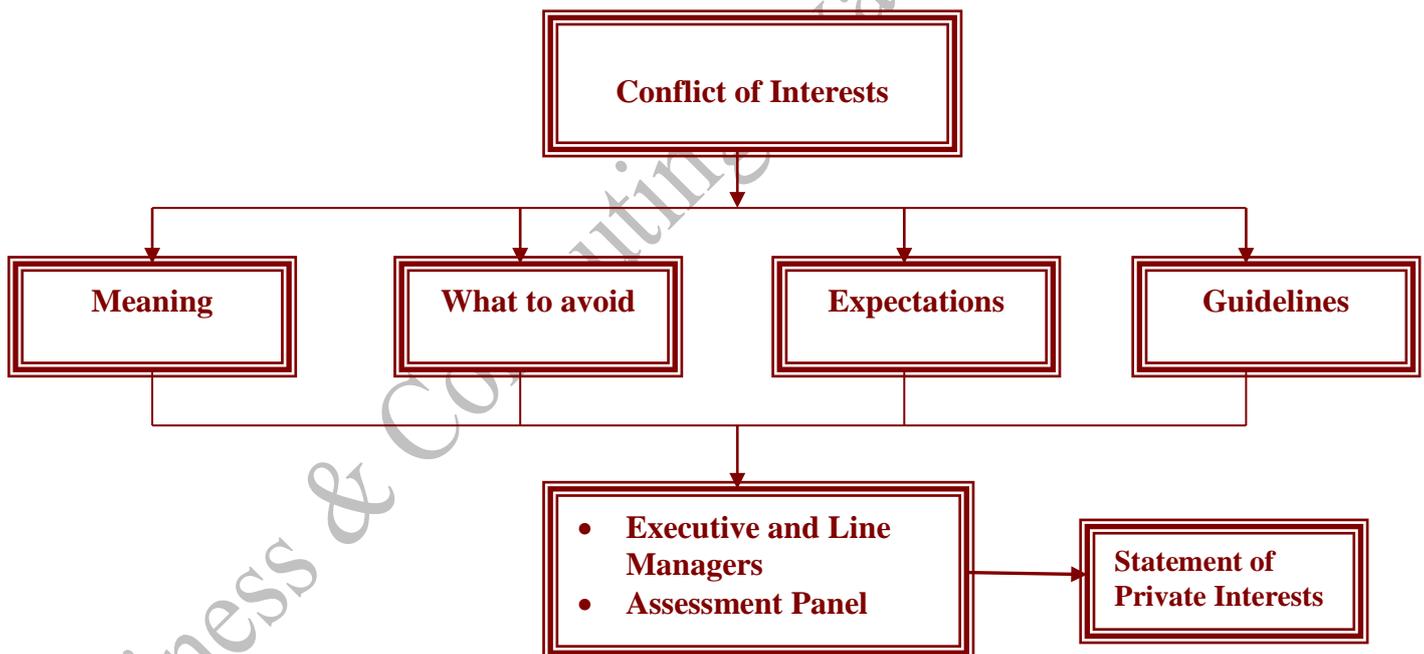




Conflict of Interests Policy

Policy No.:	P013
Revision Date:	October 2017, <i>revised September 2020</i>
Status:	Approved
Responsibility for policy:	Board of Advisors
Responsibility for implementation:	Board of Advisors Chairperson

Conflict of Interests Framework



BCE realises the importance of public confidence in qualifications and the effect of unfairness to learners/Centres, hence potential conflicts have previously and continues to be actively managed and all Centres are treated equally and subject to the same quality assurance and rigorous Centre approval processes.

It is our policy that staff and others acting on behalf of BCE must be free from conflicts of interest that *could adversely influence their judgment, objectivity or loyalty to the organisation when conducting BCE business activities and assignments*. BCE recognises that staff may take part in legitimate financial, business, charitable and other activities outside BCE assignments, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

BCE management approach to conflicts of interest is twofold; *presumption against* (prohibition) and *presumption for* (disclosure and peer review). Prohibition discourages any arrangement, particularly financial, that might create a conflict of interest, especially for Quality Assurance Manager who is mostly in direct contact with Centres undertaking different activities for example; Centre approval visits, malpractice investigation, supervision and enforcement or presiding over Centre suspension appeals. These situations create potential environment for bias or unethical behaviour. To avoid this, if a Centre is investigated for a serious matter, it is best to engage an independent person who had never dealt with the Centre in question. Even through Programme Design & Review, Assessment Panel and Quality Assurance Manager are fully independent, in terms of employment contract at BCE, they are still prohibited or severely restricted by BCE regulations from such activities as serving on an advisory board, consulting with Centres or holding shares in a BCE Centre.

We are fully aware that conflicts of interest are unavoidable and that financial conflicts of interest are only the most visible and perhaps the least scientifically dangerous. Acknowledging potential sources of bias promotes an awareness of different points of for a strong peer-review process. Where blanket prohibitions are missed, disclosing and understanding bias as best as possible is a more realistic goal than thinking it cannot happen to us and believing we can eliminate them. Though given that the most valuable asset for BCE as an awarding body is credibility, most personnel would not jeopardize this credibility; however, we do not take any chances. We are also fully aware that conflict of interest is subtle and hard to detect, hence we have created approach measures to deal with it.

What it means

- Request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest. Remember that management approval is subject to ongoing review, hence personnel need to periodically update management on any involvement.
- Avoid personal relationships with other BCE stakeholders where parties in the relationship may receive or give unfair advantage or preferential treatment because of the relationship.
- Avoid actions or relationships that might conflict or appear to conflict with professional responsibilities or the interests of BCE.
- Even just the appearance of a conflict of interest can damage an important company interest.

- Obtain necessary approvals before accepting any position as an officer or director of an outside business concern.
- Prior to serving on the Board of a bona fide charitable, educational or other nonprofit organisation, immediate or third party; staff are encouraged to advise BCE management.

What to avoid

- Accepting a gift from BCE Centres or other stakeholders.
- Having a direct or indirect financial interest in or a financial relationship with BCE competitor, supplier or customer (except for insignificant share interests in publicly-held companies).
- Having a second job or consulting relationship that affects ability to satisfactorily perform BCE assignments.
- Having romantic relationships with certain or other staff where:
 - There is an immediate reporting relationship between the staff.
 - There is no direct reporting relationship between the staff but where a romantic relationship could cause others to lose confidence in the judgment or objectivity of either staff, or the relationship could cause embarrassment to the organisation.

Expectations

BCE is required to maintain a high standard of professionalism and ethical conduct in its operations. It is essential that confidence is maintained and in particular, in the integrity of the Assessment of BCE Qualifications. The selection, assessment and evaluation processes must be fair, effective and impartial. We expect BCE personnel to:

- perform their duties impartially, uninfluenced by fear or favour
- not to allow the pursuit of private interest to interfere with the proper discharge of BCE duties and responsibilities
- act with integrity, objectivity, openness and honesty in official dealings
- be accountable for their decisions and actions
- not use information obtained in the course of official duties to gain directly or indirectly pecuniary or other advantages for themselves
- be subject to an appropriate level of scrutiny
- not to accept any gift, hospitality or concessional travel offered in connection with the discharge of BCE official duties
- provide assurances to BCE executive management
- adhere to declaration and confidentiality requirements [see Statement of Private Interests]
- disclose any conflicts of interest related to official duties

This applies to all BCE senior personnel, including:

- Board of Advisors and CEO
- Line Managers
- Committee members
- Assessment Panel

All conflict of interest information provided is given and received in confidence. This information is handled and treated as confidential material and used only for the purpose of BCE operations.

Conflict of interest will arise from time to time. The guidelines below are designed to ensure that all such conflicts are identified, disclosed and managed in a transparent way that promotes confidence in the integrity, legitimacy, impartiality and fairness of BCE operations and decision-making processes.

BCE Guidelines

Conflict of interest is a situation in which someone in a position of trust has competing professional or personal interests. Such competing interests could make it difficult for an individual to fulfil his or her duties impartially, and potentially could improperly influence the performance of their official duties and responsibilities.

General approaches to dealing with Conflict of Interest

1. Disclosure

Disclosure of relevant interests and activities annually; though considered intrusive and impolite, we try to explain in simple terms and allow free expression of speech through discussions and debates. This ensures personnel fully understand it is essential for BCE to probe senior personnel financial interest in areas that affect their work, just as it is essential to know where they came from and who they did their work with because of other subtle biases. We get this information so that others (for example, regulators) can judge it in the context of our work. If one cannot stand before the public and defend the source and circumstance of receiving huge sums of money or gifts from whatever the source may be, then one shouldn't be doing it as others may think otherwise.

2. Self-Regulation

We encourage personnel to consult their conscience. Unethical behaviour is totally unacceptable, as it undermines the integrity of the qualifications. It distorts legitimate measures of a learner's achievements, leading to inaccurate reporting and disadvantages to other learners.

3. Defining Categories of Acceptable Activities and Implementing Oversight

BCE Conflict of Interest policy outlines acceptable activities and the oversight procedures; by encouraging all senior personnel including Assessment Panel to seek special attention, make a full annual disclosure of their potential conflicts of interest and seek explicit approval before accepting other external responsibilities that might be perceived as unethical and ill-judged.

4. Sanctions

Our approach to conflict of interest specifies the following sanctions in rough order of severity: formal admonition; inclusion in a personnel file of a letter from the CEO that an individual's good standing member has been called into question in regards to quality assurance, marking assessments or designing qualifications; nonrenewal of appointment; and dismissal from employment.

BCE principles of working practice Governance

- BCE recognises the need to manage the potential conflict of interest between its awarding and delivery functions. In doing this, BCE commits to the following practices:
 - The CEO delegates accountability of the approval and quality assurance of Centres and the on-going management of the assessment process to other senior officers in the organization.
 - The CEO ensures impartiality in the management of complaints relating to/ or made by Centres.
 - The CEO ensures impartiality in the management of any investigations into issues of malpractice or maladministration relating to Centres.
 - The BCE Board of Advisors has an ongoing remit to ensure the integrity of this separation of responsibilities.

All personnel should show restraint and be accountable and transparent in all activities.

Assessment Panel

- If an assessor has a personal interest relating to a candidate being assessed; this information must be disclosed to BCE and the Chief Examinations Officer will take the necessary action to ensure impartiality, by ensuring someone else marks the candidate's work.
- If an assessor has a personal interest relating to a particular Centre, this information must be disclosed to BCE and the Chief Examinations Officer will take the necessary action to ensure impartiality, by ensuring someone else marks the candidate's work.
- If an assessor is identified to have a personal bias either for or against a particular Centre during standardisation or verification activity, BCE will take the necessary steps to ensure impartiality, by explaining the adverse effect. If they fail to change their attitude or behavior, then sanctions may be applied.

Programme Design & Review Panel

- If specialist recommends learning resources textbooks associated with Authors or Publishers they have a stake or financial interest in; they should disclose their affiliation to the Programme Development Manager.

Recruitment

On appointment, all executive. line managers and Assessment Panel are required to complete a Conflict of Interests Declaration and clearly indicate any conflicts of interest that may impact on their ability to undertake the role for which have been selected. This information will be reviewed annually by the Board of Advisors to ensure the information is accurate and to determine its relevance to current BCE operations.