

BCT Conflict of Interest Policy

1. Purpose

Big Creative Training (BCT) is committed to ensuring that the development, delivery, assessment, internal quality assurance and administration of qualifications are conducted fairly, objectively and in accordance with the requirements of relevant awarding bodies.

A conflict of interest may arise where an individual's personal, professional or other interests could influence, or could reasonably be perceived to influence, their judgement or actions in relation to the delivery, assessment, quality assurance or administration of a qualification.

The purpose of this policy is to ensure that actual, potential or perceived conflicts of interest are identified, declared, recorded and appropriately managed.

2. Scope

This policy applies to all BCT staff and any other individuals acting on behalf of BCT who are involved in the development, delivery, assessment, internal quality assurance or administration of qualifications.

A conflict of interest may exist where:

- an individual's personal, professional, financial or other interests have the potential to influence their judgement or actions in relation to the development, delivery, assessment, quality assurance or administration of a qualification;
- an individual's relationship with another learner, member of staff or other person involved in the qualification could influence, or reasonably be perceived to influence, their professional judgement;
- BCT has an organisational interest or involvement that could potentially conflict with its responsibilities in relation to the fair and appropriate delivery, assessment or administration of qualifications; or
- an informed and reasonable observer could reasonably conclude that a conflict of interest exists.

A conflict of interest does not necessarily mean that improper action has occurred. However, actual, potential and perceived conflicts must be identified and appropriately managed in order to protect the integrity of assessment and qualification delivery.

3. Responsibilities

All BCT staff involved in qualification delivery, assessment, internal quality assurance or administration are responsible for identifying and declaring any actual, potential or perceived conflict of interest that may affect their work.

Individuals must make a declaration as soon as they become aware that a conflict exists or may arise.

Managers and those responsible for assessment and quality assurance must ensure that declared conflicts are considered and that appropriate measures are put in place to remove or mitigate the conflict wherever possible.

BCT is responsible for ensuring that conflicts of interest are appropriately recorded and that relevant awarding bodies are notified where required by their regulations or procedures.

Failure to declare a known conflict of interest, or undertaking assessment or quality assurance activity where an unmanaged conflict exists, may be investigated under the relevant awarding body's Malpractice and Maladministration Policy and/or BCT's relevant procedures.

4. Declaring and Managing Conflicts of Interest

Any conflict of interest relating to the assessment, internal quality assurance or administration of vocational qualifications must be declared within BCT.

Each individual involved in the assessment and quality assurance process is personally responsible for declaring any conflict of interest that affects, or could reasonably be perceived to affect, their role.

The declaration should include:

- the individuals involved;
- the nature of the actual, potential or perceived conflict;
- the qualification, learner, assessment or activity affected, where applicable; and
- any proposed measures to remove or mitigate the conflict.

Where BCT is able to manage or mitigate a declared conflict, the measures taken will be recorded in the Conflict of Interest Log.

Mitigation may include, where appropriate:

- allocating a different assessor or Internal Quality Assurer (IQA);

- ensuring that individuals with a personal relationship are not responsible for assessing or quality assuring one another's work;
- introducing additional independent scrutiny or quality assurance;
- reallocating relevant administrative or decision-making responsibilities; or
- implementing another control appropriate to the nature of the conflict.

The effectiveness of the mitigation should be considered to ensure that the integrity and fairness of the relevant assessment or process are protected.

5. Conflicts That Cannot Be Fully Mitigated

Where BCT cannot adequately remove or mitigate a conflict of interest internally, the conflict will be declared to the relevant awarding body where required.

For example, this may occur where the only appropriately qualified assessor and Internal Quality Assurer available are related or otherwise have a relationship that creates an unavoidable conflict.

BCT will provide the awarding body with details of the conflict and any steps already considered or taken. The awarding body may then determine whether additional arrangements or external quality assurance measures are required.

BCT is responsible for ensuring that any required declaration is submitted to the relevant awarding body and that any additional measures required by the awarding body are implemented.

6. Examples of Conflicts of Interest

Examples of situations that may create an actual, potential or perceived conflict of interest include:

- an assessor and Internal Quality Assurer having a close personal or family relationship;
- an assessor or Internal Quality Assurer assessing or quality assuring the work of their child, relative, partner or another person with whom they have a close personal relationship;
- a member of staff being involved in an assessment or quality assurance decision concerning someone with whom they have a significant personal or professional relationship;
- an individual having a financial or other personal interest that could influence their professional judgement in relation to assessment or qualification delivery; or
- any other relationship or interest that could reasonably lead another person to question the individual's impartiality.

This list is illustrative and is not exhaustive. Where an individual is uncertain whether a situation constitutes a conflict of interest, they should declare it so that it can be considered and, where necessary, appropriately managed.

7. Recording and Monitoring Conflicts of Interest

BCT will maintain a Conflict of Interest Log to record declared conflicts and the actions taken in response.

The log will record, as appropriate:

- the date of the declaration;
- the individual(s) involved;
- the nature of the conflict of interest;
- the qualification, learner or activity affected, where relevant;
- the mitigation or controls put in place;
- whether the relevant awarding body was notified; and
- the awarding body's response or any additional mitigation required.

Declared conflicts should be reviewed where circumstances change or where there is reason to believe that the mitigation originally put in place is no longer sufficient.

8. Conflict of Interest Log

Centre: Big Creative Training Ltd

Internal Quality Assurer: Julian Duggan

Date	Nature of conflict of interest	Mitigation/action	AO notified, where required	AO response/additional mitigation
Example: Staff X and Staff Y are siblings	Personal/family relationship between members of staff	Separate line management and assessment/quality assurance responsibilities assigned	N/A	N/A



9. Policy Review

This policy will be reviewed annually by BCT.

Where amendments to BCT's Conflict of Interest Policy directly affect arrangements with an awarding body, the relevant awarding body will be notified where required.

Date Updated	Next Review	Manager Responsible
July 2026	July 2027	Julian Duggan