



BBE
TRAINING



A CITRUS GROUP
COMPANY

BBE Conflict of Interest Policy



1. Purpose

This policy applies to all BBE Training and Citrus Group employees, contracted staff and other key stakeholders who may influence qualification development, delivery, assessment, quality assurance or awarding decisions. It sets out the arrangements for identifying, declaring, recording, reviewing and managing actual, potential and perceived conflicts of interest.

The purpose of the policy is to protect the integrity, fairness and impartiality of BBE Training activities and to ensure that decisions are not improperly influenced by personal, financial, professional or organisational interests.

Core principle

Anyone who is unsure whether a situation represents a conflict of interest should disclose it. Early declaration allows the risk to be assessed and managed before impartiality or confidence is affected.

2. Scope

This policy applies to all persons and organisations engaged with BBE Training qualifications or associated activities, including:

- BBE Training and Citrus Group employees, managers and governing or compliance personnel.
- Tutors, assessors, internal quality assurers, moderators, markers and other contractors.
- Employers, approved centres, partner centres and other third parties involved in delivery or assessment.
- Awarding body personnel, business development staff and any person able to influence learner, centre or qualification outcomes.

3. What is a conflict of interest?

A conflict of interest arises where an individual or organisation has competing interests, loyalties, relationships or duties that could influence, or could reasonably be perceived to influence, the impartial performance of their role.

Conflicts may be actual, potential or perceived. A perceived conflict can be as important as an actual conflict because it may undermine confidence in the fairness or integrity of a decision.

4. Examples of conflicts

- A moderator, marker, assessor or quality assurer being allocated work relating to a family member, close friend or person with whom they have a significant personal relationship.
- A moderator, marker or assessor reviewing work from a centre in which they have an ownership, employment, delivery, assessment or internal quality assurance interest.
- A person involved in preparing learning resources also having access to, influence over, or responsibility for related assessment decisions.
- BBE Training favouring one centre, customer or partner over another in a way that could create an unfair competitive advantage.
- A staff member or contractor making a decision that could result in a personal financial or professional benefit.
- A person using confidential information obtained through their BBE Training role for another business, centre or personal interest.

5. How conflicts are identified

BBE Training uses both proactive declarations and ongoing monitoring to identify conflicts of interest. Identification is not limited to annual declarations; individuals must report new or changed circumstances as soon as they become aware of them.

	Control	Requirement
1	Initial declaration	All employees, contractors and relevant stakeholders complete a conflict of interest declaration when appointed, engaged or required by BBE Training.
2	Annual declaration	A fresh declaration is completed at least annually, including a nil return where no interests are identified.
3	Event-driven disclosure	Any new, changed or previously undeclared interest is reported promptly and before an individual takes part in the relevant decision, assessment or activity.
4	Operational checks	Managers, assessors, quality personnel and administrators consider relationship and centre interests and previous involvement when allocating work or making decisions.
5	Ongoing review	Declared interests and mitigation actions are reviewed whenever circumstances change, when an activity is reallocated, or during the annual policy/register review.

6. Logging and reporting conflicts

All identified or declared conflicts must be recorded on the BBE Training Conflict of Interest Register. The register is the central record of the conflict, the risk assessment, the decision taken, the mitigation applied and the review or closure outcome.

A declaration must be reported to the individual's line manager or the appropriate BBE Training manager as soon as possible. Where the conflict involves that manager, or where independence may be questioned, it must be escalated to the Head of Centre and/or Quality Manager for review.

The person receiving the declaration must ensure that it is logged, assessed and allocated for action. No individual should make a decision about their own conflict without independent oversight.

Minimum information to record

- Name and role of the person or organisation declaring the interest.
- Date the conflict was identified or reported.
- Description of the actual, potential or perceived conflict and the activity affected.
- Persons, learners, centres, suppliers or decisions connected to the conflict.
- Initial risk level and the potential impact on impartiality, confidentiality, fairness or assessment integrity.
- Decision-maker, agreed mitigation controls, review date and final outcome or closure date.

7. Who deals with conflicts of interest?

Role	Responsibility
All staff, contractors and stakeholders	Recognise and disclose conflicts promptly; provide accurate information; comply with agreed controls; report changes.
Line managers / operational managers	Receive declarations, make initial checks, prevent affected individuals from acting where necessary, and ensure the matter is logged and escalated appropriately.
Head of Centre	Provides senior operational oversight for conflicts affecting learners, delivery, assessment, centre decisions or business relationships; approves significant mitigation or reallocation.
Quality Manager	Reviews conflicts that may affect assessment integrity, quality assurance, moderation, compliance or awarding body requirements; determines additional scrutiny and monitors the effectiveness of controls.
Governing / Compliance Committee or senior leadership	Considers serious, systemic, recurring or strategically significant conflicts and determines action where the risk cannot be adequately controlled at operational level.
Administrator / register owner	Maintains the Conflict of Interest Register, retains declarations and evidence, tracks review dates, and ensures actions and closures are recorded.

8. Assessment and quality assurance conflicts

BBE Training will take all reasonable steps to prevent any part of a learner's assessment, moderation or quality assurance from being undertaken by a person who has a personal interest in the result. Where involvement cannot reasonably be avoided, the relevant assessment or decision must be subject to independent scrutiny by another suitably competent person.

Staff and contractors must also declare involvement in the preparation of learning resources or materials that could create a conflict with assessment or quality assurance responsibilities. Such declarations will be monitored so that the integrity and confidentiality of assessment are not compromised.

9. Managing conflicts and applying mitigation

The aim is to remove the conflict where possible. Where removal is not practical, BBE Training will apply proportionate mitigation to reduce the risk to an acceptable level. The chosen controls must be documented in the Conflict of Interest Register and reviewed for effectiveness.

Remove: Reassign the activity so the conflicted person has no role in the affected decision, assessment, moderation or approval.

Restrict: Limit access to information, systems, learner records, assessment materials or meetings connected to the conflict.

Separate duties: Split responsibilities so that no individual can influence all stages of a decision or process.

Independent scrutiny: Require a second competent and impartial person to review, verify, sample or approve the decision.

Recusal: Require the conflicted person to withdraw from discussion, scoring, assessment, procurement, recruitment or approval.

Enhanced monitoring: Increase sampling, oversight, audit checks or management review for a defined period.

Disclosure: Make the conflict known to relevant decision-makers where transparency itself reduces the risk of hidden influence.

Cease involvement: Where the conflict is fundamental or cannot be managed satisfactorily, prevent the person or organisation from undertaking the affected activity.

10. Risk-based decision process

When a conflict is reported, the person responsible for dealing with it should consider the seriousness and likelihood of harm before deciding the appropriate control. The assessment should consider:

- Whether the conflict is actual, potential or perceived.
- The individual's level of influence over the affected activity or decision.
- The risk to learner fairness, assessment integrity, confidentiality, regulatory compliance or BBE Training's reputation.
- Whether the conflict can be removed completely or only reduced through controls.
- Whether independent scrutiny is sufficient to preserve impartiality.
- Whether the conflict is temporary, recurring, systemic or likely to change over time.

Escalation rule

Where there is doubt about whether mitigation is sufficient, the activity should not proceed until the Head of Centre and/or Quality Manager has reviewed the conflict and approved the controls.

11. Example mitigation scenarios

Example conflict	Required management / mitigation
Assessor is allocated a family member	Reallocate the learner to another assessor. Record the declaration and reallocation. The original assessor must not access or influence the assessment decision.
Moderator has worked for the centre being sampled	Use a different moderator where possible. If unavoidable, apply independent secondary scrutiny and record the reason and controls.
Staff member has a business interest in a supplier or partner	Remove the staff member from procurement, approval or commercial decisions connected with that supplier or partner.
Resource author is involved in related assessment activity	Separate the resource-development and assessment roles, restrict access to confidential assessment information, and apply independent review.
Senior decision-maker has a personal interest in the outcome	Require formal recusal and transfer decision-making authority to an impartial manager or committee member.

12. Preventing conflicts

BBE Training seeks to prevent conflicts from arising by applying the principles of neutrality, openness and fairness. In particular, BBE Training will:

- Provide and facilitate open dialogue with approved centres and key stakeholders.
- Avoid unreasonable barriers to learners and approved centres.
- Avoid favouring one approved centre in a way that creates a competitive advantage.
- Avoid exclusive or restrictive arrangements that could improperly reduce competition.
- Provide approved centres with fair access to relevant services, information, meetings and processes.
- Use role separation, allocation checks and quality assurance controls to reduce predictable conflicts before they arise.

13. Failure to declare or comply

Failure to declare a known conflict, providing incomplete or misleading information, or failing to follow agreed mitigation may be treated as a serious matter. BBE Training may remove the individual from the activity, increase oversight, suspend access or duties, refer the matter for disciplinary or contractual action, or escalate it through governance and quality assurance arrangements as appropriate.

14. Records, confidentiality and retention

Declarations, register entries, risk assessments and mitigation decisions should be handled confidentially and shared only with those who need the information to assess or manage the conflict. Records must be stored securely in accordance with BBE Training's normal information governance arrangements.

15. Monitoring and review

The Conflict of Interest Register will be reviewed periodically to ensure agreed actions remain effective and outstanding reviews are completed. The policy and supporting procedure will be reviewed annually, or sooner where a significant incident, regulatory change, awarding body requirement or internal review indicates that an update is required.

16. Conflict of Interest Register - minimum fields

Reference number	Name / organisation	Role	Date identified
Conflict description	Actual / potential / perceived	Activity or decision affected	Initial risk level
Person reviewing	Mitigation agreed	Owner of actions	Review date
Outcome / closure date	Further escalation required		

17. Responsibilities of all persons

- Conduct activities in a way that maintains BBE Training's quality assurance standards and integrity.
- Keep BBE Training responsibilities clear and separate from other roles or interests wherever possible.
- Monitor personal circumstances and activities for new or changing conflicts.
- Recognise and report actual, potential or perceived conflicts promptly.
- Comply with any mitigation, restriction, recusal, review or reallocation required by BBE Training.

Policy control

Last reviewed: Sept 2026 | Next review: June 2027 | Owner: BBE Training