



Delivery Centre Conflict of Interest Policy

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Delivery Centre Conflict of Interest Policy

Introduction

The purpose of this policy is to provide guidance to Paddle Cymru assessors, internal verifiers and administrators of BCAB (BCAB) qualifications on the handling of possible conflicts of interest.

Paddle Cymru and Paddle Cymru assessors have a reputation to uphold and responsibility for delivery of high quality learning, teaching and assessing leading to a wide variety of BCAB qualifications and awards. It is important to us that all individuals and organisations with which we have dealings are confident that all of our assessment-related operations are free from improper influence.

The most important feature of the policy is the instruction that assessors should always disclose an activity if there is any doubt about whether it represents a conflict of interest.

This policy:

- defines responsibilities of Paddle Cymru and individual tutors, and assessors;
- describes what is meant by conflict of interest in these circumstances;
- sets out which conflicts can be managed and how they should be managed, and those which are considered unmanageable and therefore cannot be allowed;
- illustrates potential conflict of interest situations;
- provides guidance and principles to inform decision-making in managing conflicts;
- outlines the procedures for disclosing conflicts and seeking approval.

Scope

This policy applies to all those who interact with BCAB assessment-related work within Paddle Cymru. This includes individuals involved with all aspects of administration, internal verification, candidate assessment and any other activity connected with the associated supporting resources and services.

The content of the policy cannot cover every potential conflict and must be interpreted in the light of the particular circumstances of each case.

Responsibilities

Paddle Cymru is responsible for managing conflicts of interest in relation to BCAB awards/qualification. We will ensure;

- conflicts of interest that might detrimentally impact on standards of, or public confidence in, BCAB qualification/award delivery or the reputation of BCAB are identified and managed;
- tutors, assessors, verifiers and administrators are supported to act in the best interests of the candidate, Paddle Cymru and BCAB;
- all staff involved with Paddle Cymru Delivery Centre functions are familiar with this policy (and the generic [Paddle Cymru Conflict of Interest Policy](#)) and comply with it.

All individuals involved in BCAB Qualification/Award delivery, verification or administration will;

- familiarise themselves with this policy and comply with it;
- recognise situations where a potential conflict of interest may arise or where others may consider a conflict exists;
- disclose any potential conflict of interest and follow the processes set out in this policy;

What is a Conflict of Interest?

A conflict of interest occurs when an assessors' (or other persons' involved in the assessment process) ability to exercise independent judgement, or to perform their role objectively, is, could be, or could be seen to be impaired or otherwise influenced by their involvement in another role or relationship.

It's a conflict if you think (or someone else could think) that;

- your relationship with an individual impacts your ability to exercise independent judgement or to perform your role objectively;

AND/OR

- you have conflicting loyalties that would prevent you from acting in the best interests of Paddle Cymru or BCAB.

Conflicts of Interest in Assessment

The most significant conflicts that concern us are those which might affect an assessment result. For example, a candidate being (or thought to have been) recommended for an award without meeting the requirements, or conversely a candidate not being recommended when they do. This might be down to the actions or influence of the Assessor, Verifier, or Delivery Centre Administrator.

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Conflicts of interest can arise in a variety of circumstances. The following are examples of situations (not an exhaustive list) that could lead to actual or perceived conflicts of interest:

An assessor;

- Assessing someone with whom they have a personal relationship. In these cases the candidate could be (or thought to be) recommended for an award without meeting the requirements, or conversely a candidate not being recommended when they do.
- Assessing someone where they will personally gain from the candidates' successful result (e.g. an assessor who is also an employer who can then deploy the candidate).
- Who has personal interests - paid or unpaid - in an organisation linked to the candidate. e.g. an assessor who is employed by the same organisation as the candidate, where pressure from the organisation could (or could be seen to) influence the assessors decisions).
- Who is (or has a close personal association with) a member of Paddle Cymru staff or Board, BCAB, Paddle UK or has some other connection, for example, as an adviser or consultant. In these circumstances, the relationship may influence how the assessor is treated. E.g. the assessor is given leniency for unacceptable behaviour due to their relationships/associations, or the assessor has access to 'inside knowledge' that they can use to unfairly benefit learners.

Similar circumstances can arise for Internal Verifiers and Administrators where a relationship with a candidate, assessor or external organisation might lead to potential for personal gain, unfair bias or challenge the individual's ability to act in the best interests of Paddle Cymru or BCAB.

Requirements

Requirements for Assessors

BCAB Regulated awards (Paddlesport Instructor, SUP Instructor, Coach/Performance Coach);

- Assessors must not assess close friends** or family*.
- Assessors should avoid, where possible, assessing colleagues or employees.
- In cases that are unavoidable, assessors must request approval (see appendix 2) prior to assessing anyone where a conflict of interest exists (including friends, colleagues, and employees)

BCAB Non-regulated awards (Leadership Awards and Personal Performance Awards)

- Assessors must not assess close family*.

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- Assessors should avoid (where possible) assessing friends**, colleagues or employees.
- In cases that are unavoidable, assessors must request approval (see Appendix 2) prior to assessing anyone where a conflict of interest exists (including friends, colleagues, and employees).

Requirements for Paddle Cymru Employees

A Paddle Cymru employee must not be involved (unmonitored) at any level with any activity relating to BCAB qualification/award assessment relating to a close family member*. This includes for example;

- Assessing a candidate
- Verification or standardisation of a tutor or assessor
- Administrative tasks such as manual approval of a candidate (or an assessor) prerequisites, APL applications, tutor role etc.
- Recruitment and selection of trainers, tutors and assessors

In these same situations, a Paddle Cymru employee must avoid (where possible) activity linked to friends** or anyone else where there are conflicting loyalties.

If a Paddle Cymru employee is involved in the delivery of BCAB Qualifications or awards (either within their role or through independent activity) they must not take advantage of information to which they have access to as part of their Paddle Cymru role that might unfairly advantage them (or those they are assessing) in any way.

A Paddle Cymru employee involved in the delivery of BCAB Qualifications or awards (either within their role or through independent activity) will be treated the same as all other tutors; there are no exceptions.

All staff involved with Paddle Cymru Delivery Centre functions are familiar with this policy (and the generic [Paddle Cymru Conflict of Interest Policy](#)) and comply with it.

If a conflict of interest is identified and is unavoidable, the employee must inform their line manager (or in their absence, the Responsible Officer) prior to the completion of the work task. Suitable measures will be put in place to mitigate the conflict of interest.

Requirements for Trainers

Trainers must not provide a skill verification, final sign off, internal verification or quality assurance visit for a close family member*.

Trainers must avoid (where possible) skills verification, final sign off, internal verification or quality assurance visit for friends** or anyone else where there are conflicting loyalties.

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Note that verifying a direct competitor when the verifier has a vested interest in their failure is a serious conflict of interest. If the verifier is not able to remain impartial, they should recuse themselves from the process. Otherwise, the verification could be considered biased or fraudulent, leading to potential repercussions, damage to reputation, and loss of trust.

If a conflict of interest is identified and is unavoidable the Trainer must inform the Responsible Officer prior to the completion of the work task.

Requirements for Referees

An individual must not act as a referee for a close family member* in relation to;

- Accreditation of Prior Learning applications
- Tutor / Assessor / Provider / Trainer applications
- Employed post applications

Requirements for Complaints, Malpractice, Maladministration or Appeals

An individual must not be responsible for reviewing or investigating cases arising from complaints, malpractice, maladministration, appeals (or other such activities) relating to a close family member*, friends** or anyone else where there are conflicting loyalties.

* Definition of 'Close family member'

Note: A 'close family member' includes anyone who has a direct and significant personal relationship with the person in question, such that their interests could reasonably be expected to influence the person's decision-making or judgement. For example;

- spouse or partner;
- children, step-children (biological and adopted);
- parent, step-parent, parents-in-law (biological and adoptive);
- siblings (partners siblings);
- partners of any of the above;
- other individuals who share the same household or who are financially dependent;
- other extended family members who are closely involved in the person's life.

** Definition of 'friend'

'Friendships' are harder to define. They could be characterised by those with whom you socialise outside of work and those where behaviour is not constrained by professional codes of conduct. Any relationship where your care, concern or loyalty to the individual may (or may be seen to) impact your ability to exercise independent judgement or to perform your role objectively would be considered to be a conflict of interest and should be avoided or declared.

Appendix 1: Principles

Mitigating conflicts of interest requires careful planning and adherence to ethical guidelines.

All those involved in the assessment process are entrusted with staffing assessments in order that candidates receive a fair and impartial assessment with conflicts of interest minimised where possible. Where conflicts arise extra vigilance must be shown in ensuring judgement of the candidates' evidence is done so reliably, fairly and accurately.

Here are some principles to steer actions taken by assessors, verifiers and administrators where there is, or could be seen to be, a conflict of interest;

1. Remove Yourself

- **Step Back from the Process:** If possible, remove yourself from the assessment to avoid any bias, real or perceived. Explain to those involved why you cannot be involved and signpost them to someone more suitable.

2. Seek Permission

- **Ask:** Seek permissions at the earliest opportunity. This permission (if granted) protects you from allegations of malpractice or misconduct. Conditions may be applied to how the assessment is conducted or support given to uphold the integrity of the assessment process. See details of the process in Appendix 2.
- **Escalate:** If Paddle Cymru are in any doubt of the appropriate actions required to mitigate against a potential conflict of interest (or where they themselves are conflicted) it would be appropriate to escalate the situation to BCAB or request a case is reviewed by an independent external organisation.

3. Independent Oversight

- **Involve a Third Party:** If removing yourself from the process is not possible, involve an independent third party to oversee or participate in the assessment.
- **Blind Assessment:** Anonymous and blind review processes can be used to remove personal bias. This strategy is used at times within desk based Internal Verification.

4. Standardised Criteria

- **Use Objective Criteria:** Rely strictly on the objective criteria for the assessment, keep evidence/records that back this up.

- **Be Steered by Policy and Procedure:** Diligently follow all relevant policy and procedures, seek permission for anything slightly out of the ordinary.
- **Gather Evidence:** Collect evidence of candidate performance, make comprehensive notes regarding performance against the criteria and ensure written feedback is factual, based on merit rather than personal biases.

5. Appeals

- **Appeal Mechanism:** Ensure there is a transparent process for appealing the assessment decision, allowing the candidate to challenge any potential biases.

6. Training and Awareness

- **Conflict of Interest Training:** Attend Conflict of Interest training to help you recognise and handle such situations effectively and recognise bias that may impact on decision making or how people are treated. Paddle Cymru will deliver a programme of appropriate training.
- **Ethics Awareness:** Paddle Cymru will reinforce the importance of ethical behaviour in assessments through training, organisational culture and policies. Qualities such as impartiality, consistency, truthfulness, transparency, fairness and objectivity are at the forefront of expected behaviour.

7. Learn from Mistakes

- **Report:** Let us know, as soon as it is practical, if you have got it wrong. With openness and honesty we can support a solution to rectify any potential negative impact and ensure learning is carried forward.

Appendix 2: Seeking Approval

Assessors/Tutors must follow this process to request permission to assess a candidate where there is a conflict of interest (i.e. assessing a candidate who has a close connection with you - e.g. they are a colleague, an employee, or friend);

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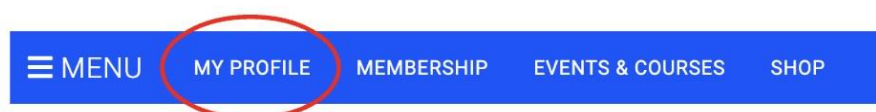
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This applies to all BCAB Assessments including

- Paddlesport Instructor
- SUP Instructor
- Coach Awards
- Performance Coach Awards
- Leadership Awards
- Personal Performance Awards

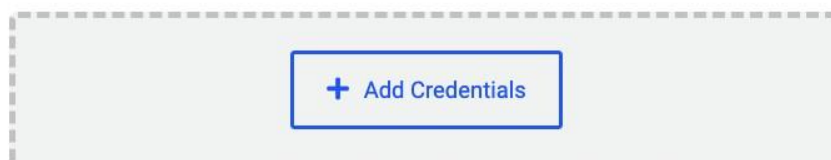
1. Log into the JustGo system. This can be reached by visiting paddlecymru.org and clicking 'Member Login.' Your username for the system will most likely be your membership number or email address.
2. Click 'My Profile' on the top menu;



3. Click 'Credentials';



4. Click 'Add Credentials'



5. Search for 'Conflict' and click on the result

A search interface. At the top is a dropdown menu labeled 'Credential Category' with 'All' selected. Below it is a search bar containing the text 'conflict'. Below the search bar, a result is shown: 'Provider Conflict of Interest Application' with a checkmark icon to its right.

6. Complete the form and 'save' to submit.
7. This will be submitted for approval and you will be notified of the result

Information provided by tutors/assessors identifying a potential conflict of interest will be evaluated by Paddle Cymru and appropriate action agreed within 10 working days.

Where reasonable steps can be taken to ensure the risks of conflicts are mitigated, written permission for the activity to be undertaken will be given along with any requirements that need to be met/evidenced. Where reasonable steps cannot be taken, a notice will be given that the activity must not take place as proposed.

An Assessment must not take place until written confirmation has been received by the Assessor.

All conflict of interest forms will be stored electronically for a period of 3 years.

Compliance

If a conflict of interest is identified by Paddle Cymru and an individual has not complied with this policy, we will investigate and, if necessary, refer to the Malpractice and Maladministration Policy.

Contact us

If you have any queries about the contents of the policy, contact coaching@paddlecymru.org.uk