
Conflict of Interest Policy for BHS Education Activities

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1. Introduction

The British Horse Society (BHS) is committed to making sure all its activities are conducted fairly, transparently, objectively and free from bias. Arrangements for the effective management of conflict of interests are integral to this.

2. Scope and applicability

This policy applies to:

- Assessments organised by the BHS Education Team. This includes qualifications awarded by BHS and BHSQ.
- Personal Development Qualifications awarded by BHSQ and managed by the BHS Changing Lives Through Horses (CLTH) Team (Appendix 1).
- Other activities such as qualification development and advisory groups.

This policy is for:

- Candidates.
- Assessors, Internal Quality Assurers and Assessor Mentors.
- Approved assessment centres, including CLTH centres (and their workforce).
- Trainers.
- BHS employees.
- BHS Accredited Professional Coach and Education Development Advisory Group members.
- Others as relevant.

3. Purpose and objectives

The purpose of this policy is to give relevant guidance and knowledge regarding conflict of interest. It will detail how they are managed within the delivery of BHS assessments and other activities managed by the BHS Education Team. It will detail how they are managed within the delivery of the Personal Development Qualifications.

This document will:

- Define conflict of interest, providing examples of potential conflicts.
- Communicate the expectations for declaring and recording such conflicts.
- Detail the processes for managing conflicts of interest.

It is useful to refer to the following documents and policies when reading this:

- Malpractice and maladministration.
- Whistleblowing.
- Your training centre or assessment centre may have a Conflict of Interest Policy and Procedure that you may wish to view.

For BHS Accredited Professional Coach and Education Development Advisory Group members it is useful to refer to:

- BHS Accredited Professional Coach and Education Development Advisory Group Terms of Reference

For BHS Assessors it is useful to refer to

- Contract for BHS Assessors

For CLTH Lead Coaches it is useful to refer to the PDQ Handbook.

4. Terms and definitions

A **conflict of interest** arises whenever an interest could reasonably be perceived as affecting, or having the capacity to affect, and individual's ability to make impartial decisions on the BHS's behalf. This could be, for example, due to employment, financial, appointments (voluntary or otherwise), professional body membership, investments, partnership, shareholdings and other beneficial interests.

Direct conflicts of interest are relatively easy to identify. The interest (personal, financial or other) relates directly to the duties an individual carries out for the BHS. An example is an assessor making assessment decisions about a candidate they personally know (for example a friend or someone they have trained).

Indirect or perceived conflicts of interest can be more challenging to identify and often more to do with perceptions. An indirect conflict of interest is where the interest (personal, financial or other) applies to someone who has a close personal connection to an individual who carries out duties for the BHS. For example, an individual making a decision that assists an assessment centre where their family member is employed has a conflict of interest, as the possibility of being influenced exists.

Assessor is used throughout the document referring to any BHS contracted personnel at BHS assessments. For the purpose of this document it includes the role of Assessor, Internal Quality Assurer and Assessor Mentor, as applicable. For clarity throughout this document, those who undertake the role of assessor for the Personal Development Qualifications will be referred to as the **PDQ assessor**. PDQ assessors are not contracted to the BHS.

BHS assessments are those delivered for Stage 1-4, Coaching4All, Performance/BHSI and Fellowship qualifications only.

Approved assessment centre or **assessment centre** is any location where a BHS assessment is taking place.

Changing Lives Through Horses (CLTH) Centre is any location where the Personal Development Qualifications are being delivered.

Candidate is used throughout the document referring to anyone training towards BHS/BHSQ qualifications and when they take their assessment. This also includes learners, students and trainees.

5. BHS's approach to managing and recording conflicts of interest

Conflicts of interest can arise in a variety of situations and are likely to happen from time to time. Equine is a very close sector where it is likely there will be situations where an interest will be identified. Interests should be declared so the BHS is informed appropriately in order to manage any potential conflict. Having a conflict of interest doesn't mean there is anything wrong. The BHS needs to ensure that a conflict of interest is managed effectively, so that:

- The certification of BHS and BHSQ qualifications are secure.
- No candidate is advantaged or disadvantaged by who they know and that all certificates are achieved on the merit of the individual.
- Decisions made by the BHS are not influenced by individuals with a conflict of interest.
- The integrity and reputation of the BHS is not damaged.

To do this, the BHS will:

- Require stakeholders actively involved with BHS education activities or delivery of qualifications within the scope of this policy (this includes BHS assessors, PDQ assessors, advisory group members and consultants) to declare any business, trade, profession or other activity which may place them in a conflict of interest with the BHS/the BHS Education Team/the BHS CLTH team as appropriate.
- Require BHS assessors, assessor mentors, PDQ assessors and BHS Internal Quality Assurers, to declare any personal conflict of interest (concerning a candidate).
- Record conflicts of interest.
- Take mitigating actions where concerns or risks are identified.
- Analyse/monitor conflicts of interest to identify trends and then provide interventions to minimise reoccurrence.

If in doubt of a potential conflict of interest, the interest must be reported anyway and clarification sought.

6. Identifying, reporting and managing conflicts of interest

6.1. BHS Assessors

During the recruitment of BHS assessors, the BHS Education Team will request declaration of interests via the Declaration of Interests Form. This should identify any interest that may influence their role as an Assessor, Internal Quality Assurer (IQA), Assessor Mentor and/or member of the BHS Accredited Professional Coach and Education Development Advisory Group (some of these roles may not be applicable to all assessors). The BHS Education Team can then understand which, if any, interests should be managed as a potential conflict. Examples of interests to declare include:

- An assessor must declare if they have a personal or professional relationship with other members of the assessor panel which could influence an IQA activity.
- An assessor must declare if they work within BHS Approved assessment centres, this could be on an employed, contracted or freelance basis.

Further situations to declare are detailed on the form.

If an assessor does not have any interests to declare, the form must still be signed and returned to the BHS Education Team. If a known conflict of interest is not reported, this may be malpractice.

When offering to assess at BHS assessments, assessors must declare whether any conflicts of interest exist and describe the nature of these so that any potential risk can be effectively managed.

6.2 BHS Assessments

6.2.1 Before the assessment day

Conflicts of interest should ideally be identified and managed before the assessment day in question.

BHS Assessors have a responsibility to:

- Not offer to assess at an Approved assessment centre where they work or teach.
- Not offer to assess at an Approved assessment centre where they have, in the previous two years, trained a candidate when they know the candidate will be taking their assessment at that centre.
- Not offer to assess at an assessment where a family member or close friend shall take their assessment.

It is the responsibility of Lead Assessors to:

- Check assessment paperwork received before an assessment.
- Liaise with the assessing team to inquire for any conflicts of interest known.
- Report any possible conflicts of interest to the BHS Education Team. This could be via email or telephone.

The BHS Education Team is required to decide an appropriate course of action to manage and minimise that risk. How that is managed may differ depending on the conflict and the circumstances. For example, the assessor may be swapped with another assessor to remove the conflict of interest.

There may be some circumstances where the BHS Education Team will make the decision to select an assessor/s who work (whether employed or deployed) at the assessment centre. This is usually when only a small pool of assessors in a region is available to select from, for example at BHS international assessments. On these occasions the BHS Education Team may mitigate the risk to the security of the assessment by implementing Internal Quality Assurance on a risk rated basis.

6.2.2 On the assessment day

On some occasions a conflict of interest may be identified on the assessment day itself. Assessors must declare their conflict of interest as soon as this is identified and before assessment begins. Examples of conflict of interest may include:

- They recognise a candidate they have delivered training to.
- They have signed off a candidate's Skills Record, unaware they were booked to the assessment.

On these occasions the Lead Assessor is required to decide an appropriate course of action to manage and minimise that risk, demonstrating a fair and impartial assessment. How that is managed may differ depending on the conflict and the circumstances. For example, this may include swapping assessor's allocation within the team

to ensure impartial assessment. The Lead Assessor should contact the BHS Education Team for advice before proceeding if they have any concerns.

The assessing team must record if a conflict of interest was identified within the candidates they assessed. This is done when submitting the assessment results. The BHS Education Team may then contact the assessor and/or Lead Assessor to determine how this was managed. The BHS Education Team may carry out retrospective Internal Quality Assurance activity to determine security of results.

6.2.3. Skills Record sign off

The Skills Record is an integral part of a candidate's assessment process. The 'Ready for Assessment' and 'Coach Endorsement' elements should not be signed off by a member of the candidate's family. This will be deemed a conflict of interest. If the assessment has taken place and IQA activity finds the trainer who signed off the Skills Record to be a family member, the candidate must have an independent sign off by a suitable Accredited Professional or Approved Centre Coach before assessment results can be released.

6.3. Other activities

Other activities may include involvement in advisory groups, working groups and consultations. The BHS Education Team may request a Declaration of Interests Form be completed and those involved should ensure conflicts of interest are declared at the earliest opportunity.

Any interest declared will be recorded by via a Register of Interest. How the conflict of interest is managed may differ depending on the conflict and the circumstances. For example, within an advisory group, a member may not be able to participate in a discussion, or vote on matters in which they have a conflict of interest.

6.4. PDQ Assessors

The BHSQ Personal Development Qualifications are delivered on a work-based learning and assessment format with CLTH Lead Coaches taking the role of PDQ assessor.

A PDQ assessor must declare to the BHS CLTH Team if they have a personal interest to any learner completing the qualifications. This interest will then be mitigated and managed appropriately during assessment, usually via increased IQA activity.

6.5 Bribery

The BHS has a zero tolerance approach for bribery.

An assessor must not accept any gift, money or other benefit for themselves or a family member) that could be seen as a bribe or reward for:

- Changing or deciding their professional actions (doing or not doing something)
- Giving an unfair advantage or disadvantage to any candidate, organisation or third party.

Even if no corruption is intended, accepting gifts or other benefit can create the appearance of a conflict of interest and damage confidence in our qualifications.

Therefore, an assessor must not accept any gift, hospitality, or benefit from a third party if it could—or could be seen to—compromise their judgement or integrity.

7. How to report a conflict of interest

7.1 Delivery of BHS Education activities

New assessors must complete the Declaration of Interest Form and return to the BHS Education Team. Existing assessors must declare any potential conflicts of interest when offering to assess. Any other concerns please contact the BHS Education Team.

7.2 Delivery of Personal Development Qualifications

Complete the Declaration of Interest Form and return to the BHS CLTH Team. Any other concerns please contact the BHS CLTH Team.

8. Record keeping

8.1 Delivery of BHS Education activities

Any declaration of interest will be added to a Register of Interest log.

The BHS Education Team must maintain records of all interests for audit and monitoring purposes. This includes:

- Name
- Relationship with the BHS
- Date reported
- Assessment date (if applicable)
- Nature of conflict
- Action taken to mitigate or remove risk
- Follow up action (if applicable)

Records will be maintained securely. Data will be processed only to ensure stakeholders act in the best interest of the BHS. The information provided will not be used for any other purpose. Conflicts of interest that may affect the security of qualifications awarded by BHSQ may be shared with BHSQ for external quality assurance purposes.

Personal data held as part of a declaration of interests will be held for the duration of time that the individual holds a formal, professional role contracted with the BHS Education Team, and for a further six months, in order to ensure transparency in decision making and to identify trends. Please see the BHS Privacy notice ([BHS.org.uk/privacy](https://www.bhs.org.uk/privacy)) for further information about how we use personal data.

8.1 Delivery of Personal Development Qualifications

Any declaration of interest will be added to a Register of Interest log.

The BHS CLTH Team must maintain records of all interests for audit and monitoring purposes. This includes:

- Name and role (for example, PDQ Assessor, IQA)
- Date reported
- Nature of conflict

- Action taken to mitigate or remove risk
- Follow up action (if applicable)

Records will be maintained securely. Data will be processed only to ensure stakeholders act in the best interest of the BHS. The information provided will not be used for any other purpose. Conflicts of interest that may affect the security of qualifications awarded by BHSQ may be shared with BHSQ for external quality assurance purposes.

Personal data held as part of a declaration of interests will be held for the duration of time that the individual is a PDQ assessor, and for a further six months thereafter, in order to ensure transparency in decision making and to identify trends. Please see the BHS Privacy notice ([BHS.org.uk/privacy](https://www.bhs.org.uk/privacy)) for further information about how we use personal data.

Appendix 1

Personal Development Qualifications

BHSQ Personal Development Qualifications (PDQ) within The Changing Lives Through Horses (CLTH) Programme aim to facilitate the development of personal and social skills through equine facilitated learning, essential for supporting access to education, training or employment opportunities. The qualifications focus on aspects that are essential for personal development such as communication, confidence, perseverance, responsibility, working with others in a team and developing new skills.

Learners have a range of special and additional education needs, including additional vulnerabilities and barriers to learning, that require reasonable adjustments and a work-based approach to assessment.

Training and learning for the PDQ, can be delivered by any coach within the CLTH centre, but should be overseen by the CLTH Lead Coach, who will act as the assessor. In some centres the lead coach may be solely responsible for the delivery of the programme and therefore will also act as assessor. This conflict of interest is normal within a work-based environment and will not need to be declared. However, if a PDQ assessor has a personal interest in a learner (for example they are related), this must be declared.

The BHS recognises that due to the profile and additional needs of learners it would be entirely inappropriate and not keeping with the ethos of the programme or qualification for learners to be assessed by assessors unknown to them. It is a strength of the qualification that a work-based model is used and CLTH Lead Coaches assess to support candidates with additional needs.

We acknowledge that the occupational expertise of assessors is one of the key factors underpinning valid and reliable assessment. For the purpose of these qualifications, the CLTH Lead Coach is the assessor with responsibility for making assessment decisions. Furthermore, we recognise that all learning outcomes should be assessed through unobtrusive observation with the learner at ease and relaxed.

Any conflict of interests with Lead Coaches acting as assessors will be mitigated by IQA activity which will ensure and demonstrate that assessment evidence is valid, authentic, reliable and sufficient to meet the specified outcomes.

The verification of assessment may be completed by one of, or a combination of:

- Visiting the assessment centre
- Professional discussion with the PDQ assessor and/or trainers and/or expert witnesses (dependent on evidence of assessment) (face to face or video call)
- Observations of assessments with learners (if appropriate)
- Reviewing evidence submitted to show assessment criteria has been met