





Conflict of Interest Policy

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Policy Approval					
Approval Required:	Please Check		Annual Review Required:	Please Check	
	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Approval Panel:	James Hope				
Approved By:	Name	Signature	Date		
	James Hope		01/09/2023		
Policy Review Date:	September 2024				
Policy Writer/s:	Charlotte Dixon				

POLICY STATEMENT

The purpose of this policy is to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of Build Skill Plus.

Our aim is to ensure that company employees and associates are aware of their obligations to disclose any conflicts of interest that they may have whilst complying with this policy to ensure they effectively manage those conflicts of interest.

This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem to the company if they are openly and effectively managed. It is the policy of Build Skill as well as a responsibility of the management, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to Build Skill.

Build Skill will manage conflicts of interest by requiring board members to:

- Avoid conflicts of interest where possible
- Identify and disclose any conflicts of interest
- Carefully manage any conflicts of interest, and
- Follow this policy and respond to any breaches.

If the conflict directly impacts on assessment; testing; training; quality assurance activity; or administration requirements (certification, claiming of funding, claiming of learning outcomes), Build Skill must demonstrate that they have identified potential conflicts of interest.

If reasonable steps cannot be taken to mitigate the identified risk, the Authorising Authority's quality representative must be notified prior to the activity taking place. This is to allow guidance to be provided and steps taken to mitigate.

SCOPE

This policy applies to all staff at Build Skill Plus & Build Skill Training including:

- Centre staff who have a relationship with a candidate, delegate or operative;
- Centre staff who have a relationship with each other;
- Centre staff that have a commercial interest in the assessment outcome
- Administrators who work for more than one ITC
- All other Associates of Build Skill Plus Ltd

Definition of “Conflicts of Interests”

A conflict of interest occurs when a person's personal interests' conflict with their responsibility to act in the best interests of the company. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder). It also includes a conflict between a manager's duty to Build Skill and another duty that the manager has (for example, to another company). A conflict of interest may be actual, potential or perceived and may be financial or non-financial. These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of Build Skill and therefore must be managed accordingly.

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Identification and disclosure of Conflicts of Interest

Once an actual, potential or perceived conflict of interest is identified, it must be entered into Build Skill's register of interests, as well as being raised with the relevant manager. Where all of the other management members share a conflict, the management should refer to the Authorising Authority's procedures to ensure that proper disclosure occurs.

The register of interests must be maintained by the Operations and Quality Manager and record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it). As conflicts of interest must be recorded on the Conflict-of-Interest Log (appendix A).

A test administrator cannot invigilate any tests for people known to them on a personal basis, all people known should be highlighted to the Chief Administrator so that fail safes can be introduced to ensure that this situation does not occur. The schedule for invigilation should be made available to the test administrator at least 24 hours before the test booking for arrangements to be made in this instance.

Confidentiality of disclosures

Senior Management will have access to the information disclosed only and such information will be disclosed to the concerned Authorising Authority. Data Protection regulations will apply at all times

Action required for management of conflicts of interest

Conflicts of interest of managers

Once the conflict of interest has been appropriately disclosed, the management (excluding the manager disclosing and any other conflicted managers) must decide whether or not those conflicted managers should:

- vote on the matter (this is a minimum),
- participate in any debate, or
- be present in the room during the debate and the voting.

What should be considered when deciding what action to take?

- In deciding what approach to take, the board will consider whether the conflict needs to be avoided or simply documented
- Whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- Alternative options to avoid the conflict the company's objects and resources, and the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of Build Skill.

Compliance with this policy

If the management has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances.

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If it is found that this person has failed to disclose a conflict of interest, the management may take action against them. This may include seeking to terminate their relationship with the company.

If a person suspects that a manager has failed to disclose a conflict of interest, they must notify a senior manager, or the person responsible for maintaining the register of interests.

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Appendix A – Conflict of Interest Log

Date	Conflict of interest identified	By Whom	Reported to	Outcome

Full details of the conflict and investigation to be recorded within the individuals staff file and are available for audit purposes.