

## Conflict of Interest Policy and Guidance

### Introduction

The Chartered Institute of Procurement & Supply (CIPS) is a recognised and regulated Awarding Body. CIPS is also a registered charity and incorporated as a Royal Chartered body by the Privy Council in 1992. The Awarding Body is committed to high levels of quality assurance and policies that are open, transparent and free from bias.

The purpose of this policy is to protect the integrity of the Awarding Body and CIPS' qualifications. The policy is designed to guide any CIPS stakeholders in terms of handling potential conflicts of interest that may arise in relation to the Awarding Body. This policy applies to all staff and other individuals who interact or potentially interact with the work of the Awarding Body. This includes individuals involved with any aspects of the administration, development, distribution, marketing, marking, or sales activity of CIPS qualifications.

### Overview

The Awarding Body, which has no commercial key performance indicators or objectives and reports to the Awarding Body Board of Trustees, scrupulously avoids any conflict between respective personal, professional or business interests and the interests of the Awarding Body, in any and all actions taken.

For the purposes of this policy 'Conflict of Interest' is defined as any situation where;

- Awarding Body activity, or activity undertaken on its behalf, has the potential to lead it to act contrary to the Conditions of Recognition in relation to the development, delivery and award of qualifications
- A person who is connected to the development, delivery or award of qualifications on behalf of the Awarding Body has interests in any other activity which could potentially conflict with the Awarding Body interests in the development, delivery or award of qualifications under the Conditions of Recognition, or
- An informed and reasonable observer would conclude that either of these situations was the case.

### Conflict of Interests Register

The Awarding Body maintains a Conflicts of Interest register to list all potential areas of conflict across CIPS. Each conflict's impact and probability is considered and relevant mitigating actions are implemented to ensure such conflicts are managed appropriately and within specified timescales.

### Training Delivery

It is recognised that the presence of a training delivery function (CIPS for Business) and an Awarding Body within one organisation could potentially introduce conflicts of interest. To mitigate against these, the Awarding Body and the CIPS Business Study Centre report to two separate directorates. Each of the directorates sits within different governance structures (i.e. the Awarding Body is governed by the Awarding Body Board of Trustees and CIPS Business Study Centre is governed by the CIPS Global Board of Trustees) to avoid conflicts at a strategic and organisational level. At an operational level, there is a formal written agreement between the directorates to detail the principles that both areas agree to work to. Any specific conflicts that are subsequently identified are included on the conflict of interest register and actioned within the stated timescales; the outcomes are managed by the Awarding Body.

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The CIPS Business Study Centre, sits within the CIPS for Business training delivery function. The Awarding Body independently audits the CIPS Business Study Centre in the same way and with the same rigorous processes that it audits all other study centres.

## Identifying conflict of interest

If a stakeholder of the Awarding Body, including employees, consultants, assessors, study centres or members of CIPS boards or committees, has any direct or indirect conflict of interest or relationship with any individual or organisation this must be declared so that the Awarding Body can take action to remove or manage the conflict where appropriate (a Conflict of Interest declaration form can be found in Appendix 1). If this is not possible, the relationship with the party/parties concerned may have to be terminated.

Where a potential conflict of interest is identified by the Awarding Body, steps will be taken to ensure that the conflict is removed, or managed to the Awarding Body's satisfaction. If this is not possible, the relationship with the party/parties concerned may have to be terminated.

The situation may arise where a conflict of interest has not been previously identified as described above, and only becomes apparent after the event. In these circumstances the Awarding Body will;

- Act urgently to identify any adverse effect arising from the conflict
- Take all reasonable steps to mitigate the adverse effect as far as possible and correct it.

## Responsibilities

### Awarding Body Board of Trustees

- The Awarding Body Board of Trustees is responsible for ensuring the Awarding Body's continued regulatory compliance including adherence to agreed policies.
- The Awarding Body Board of Trustees is responsible for the management of conflicts of interest that are escalated to them as risks to the Awarding Body.

### Responsible Officer

- The Responsible Officer is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the organisation and, when necessary, to the Awarding Body Board of Trustees and the regulatory authorities.

### Head of Assessment

- Head of Assessment is responsible for managing conflicts of interest of the assessment team, including ensuring contractual arrangements are in place to oblige the assessors to notify the Awarding Body of conflicts of interest. Conflicts of interest include previous or current involvement in the development of learner resource materials to support candidates in the preparation for CIPS' assessments (not including materials developed exclusively for candidates that the assessors or authors teach).
- Head of Assessment Standards is responsible for ensuring conflicts of interest for the assessment team are reviewed prior to each examination series.

### Directors and Senior Managers

- Directors and Senior Managers in each department/team are responsible for communicating and providing training where applicable on the Conflict of Interest Policy to all relevant individuals within their area of responsibility at least annually.
- All departments are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.

- iii) Line managers are responsible for ensuring that all new staff involved in activity with potential or actual conflicts of interest receives training.
- iv) Any new conflicts identified must be included on the Conflicts of Interest register and the Awarding Body must be notified within 48 hours (maximum).

### **Individual responsibility**

- i) All individuals involved with Awarding Body activities must be made aware of this policy as part of their induction and on-going training. The individual is responsible for ensuring that they are fully conversant with the policy and abide by the content.
- ii) All individuals are responsible for disclosing any activity that might give rise to a potential conflict of interest either to their line manager or directly to the Awarding Body, as appropriate.

## **Procedures to mitigate potential conflicts of interest**

### **Governance**

The Awarding Body Board of Trustees must declare any potential conflicts of interest. If a decision will personally affect any of the board members, they will be asked to leave the meeting and will not have voting rights. This will be detailed in the terms of reference for any groups working within the Awarding Body including the Centre Approvals Panel and the Assessment Quality Board.

CIPS has organisational structures which limits the potential possibility of any internal conflict of interest however, where any conflict of interest is identified, it will be mitigated appropriately. To this end Membership and CIPS for Business are in different Directorates from the Awarding Body, and the Awarding Body has a separate Governing Body with responsibility, inter alia, for limiting potential conflicts of interest.

### **External Assessors, lead verifiers, moderators, etc.**

The Awarding Body ensures that those involved in the assessment process are not responsible for the conduct of assessment or the quality assurance of assessment decisions at a centre in which they have a personal interest.

Assessors are contractually required to keep the Awarding Body informed of potential conflicts of interest, such as an association with a centre or a particular candidate. Information is updated each assessment series and recorded on the electronic marker allocation system, this will not allow material to be despatched to assessors with a conflict.

### **Invigilation**

The invigilator must not be a CIPS programme leader, a tutor of the candidates or have a personal interest in the outcome of the assessment. Invigilators must complete a conflict of interest form, declaring any potential conflict of interest prior to gaining approval to invigilate an examination. Invigilators must also submit their CV detailing their responsibilities and associations for approval by the Awarding Body.

The Head of Education Regulation will consider all applications and inform the examination centre of the following outcomes:

1. The invigilator is accepted to manage the examination
2. Further information is required to demonstrate suitability
3. The invigilator has a conflict of interest and the application has been rejected.

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If an applicant is dissatisfied with the decision, they can appeal to the CIPS Approvals Panel within two weeks of receiving the outcome.

Where an organisation hosts examinations for their own employees, the application must demonstrate the mitigating actions taken to overcome potential conflicts of interest. The invigilator must be independent of the organisation where possible (e.g. as an employee of British Council or a specialist invigilator services), but in all cases must be independent of the teaching or direct management of any candidates.

**CIPS Awarding Body  
July 2019**

**Appendix 1**

**CIPS CONFLICT OF INTEREST DECLARATION**

Actual, potential or perceived conflicts of interest could arise from any of the following (the list is not exhaustive – please indicate any possible interest that you may have):

- Previous or current employment at a CIPS study centre as a tutor or programme manager
- Appointment to a board, committee, tribunal panel, etc. of CIPS or a CIPS study centre
- Membership of a professional body with an interest in the development, delivery or award of qualifications
- Contractual relationship with the Awarding Body or CIPS, e.g. consultants
- Personal or professional relationship with a candidate who is undertaking a CIPS qualification.

Please complete either (a) or (b) below:

**(a)** I confirm that I am not currently involved, nor have I been previously involved, in any activity in relation to the development, delivery or awarding of CIPS qualifications that could be perceived as a conflict of interest.

If circumstances change and I do have a declarable interest I understand it is my responsibility to inform CIPS immediately.

Signed: ..... Date: .....

**(b)** I do have an interest to declare as set out below. I agree to notify CIPS of any changes to the interest declared below.

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The above interest is a potential conflict because:

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Signed: ..... Date: .....