



CIFA Conflict of Interest Policy

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CIFA Conflict of Interest Policy
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1: Introduction

All staff, volunteers, and management of the Certified Institute for Further Accreditation (CIFA) strives to avoid any conflict of interest between the interests of the organisation on the one hand and personal, professional, and business interests on the other.

This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

At CIFA we have an established committee that monitors and manages all potential conflicts of interest. This committee includes one member from each of the following Board of Directors, Academic Board and chaired by the CEO.

This committee will be referred to as the Conflicts of Interest Committee (COIC)

The purpose of the Conflicts of Interest Policy is to safeguard the integrity of CIFA's decision-making process, ensuring transparency and accountability. It aims to uphold the confidence of senior management in our ethical standards while protecting the integrity and reputation of our students, staff, and Directors. For further details on identifying and managing conflicts of interest, **please refer to the Risk Assessment Process for Conflicts of Interest (COIRA) page 6 Appendix 1.**

Upon appointment, each Employee/Director/Consultant/Board member completes our CIFA conflicts of interest recruitment form (COIR), to make a full, written disclosure of interests, such as relationships and posts held, that could potentially result in a conflict of interest.

This written disclosure is kept on file and updated when appropriate. See page 7, Appendix 2.

The COIC is responsible to monitor and address:

- Identified conflicts of interest.
- Any situations in which it is reasonably foreseeable that these conflicts of interest will arise in the future.
- The processes in place to manage conflicts of interest to ensure they are appropriate.



Through this, CIFA ensures that:

- Confidentiality and integrity are not compromised.
- CIFA's reputation is upheld.
- the quality of work undertaken by CIFA and its associates is maintained.

As an education provider, we have chosen to use OFQUAL's definition of a conflict of interest, whereby

- A. the company's interests in any activity undertaken by it, on its behalf or by an employee have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications under its Conditions of Recognition.
- B. a person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award under the awarding organisation.
- C. an informed and reasonable observer would conclude that either of these situations was the case.

2: Identification of potential conflicts of interest

Conflicts of interest may relate to staff, consultants, collaborative partners and other Senior management.

Examples of potential conflicts of interest may include (but are not limited to):

1. A member of staff taking a course/examination that we offer.
It is permissible for staff to take such courses/examinations. However, the study must be managed appropriately and approved by the COIC.
2. A member of staff publicly expressing values and beliefs contrary to ours in such a way that may reasonably be perceived as representative of CIFA.
3. Markers, tutors or authors acting on our behalf who have other external interests/positions that could be perceived to affect the integrity of our examinations. Unless they have previously disclosed this as a potential conflict (Academic department especially) and it is managed by our comprehensive internal and external monitoring and checking. Revert to the CIFA's Risk assessment report.
4. One or more of CIFA activities affecting, or being thought to affect, another



activity of ours. Please refer to the CIFA risk assessment policy for more information on our partner company providing online training material and also being an awarding organisation for exams.

5. CIFA employees offering private teaching or training concerning a course/examination that we offer, or a related subject. Please refer to the CIFA risk assessment policy Ref: D-RA for more information on our academic team, who have external employment at UK universities, and their employment with us on a consultative basis.
6. Ownership or substantial shares in a provider, or potential provider of services, other than CIFA or a family member having such a relationship with a competitive provider.

All members of staff are encouraged to identify other sources of potential conflict of interest in their areas of work or elsewhere e.g. this may be identified by a line manager for a new member of staff.

All declarations will be treated supportively and sensitively; declaring a risk is not seen as a negative action. Personal data will be treated in line with the **Data Protection Policy Doc (Ref: DPP)**.

For specific conflicts of interest that are identified concerning the development, delivery and award of qualifications, following disclosure and resolution on how to manage the conflict by the COIC, a record is maintained by the Operations department.

3: Managing Conflicts of Interest

Where a conflict of interest has the potential to create an adverse effect, the COIC will take all reasonable steps to mitigate and, as far as possible, correct it.

Please refer to the CIFA risk assessment for COI for a more detailed explanation of the process. Please refer to **page 7 of Appendix 1**

In determining the potential for mitigating an adverse effect, several outcomes are possible depending upon the circumstances of the potential conflict of interest.

These, as examples, include the following:

- Activities and/or functions may be reorganised so that the potential conflict is Mitigated.
- There is the separation of staff duties, for example, those responsible for



communicating with students (Student Support Services) do not have access to examination material and are not in any way able to input or /amend examination scores. While Student Support Services have access to view the CIFA exam proctoring system, any decisions taken on exam pass or fail are taken by the Quality Assurance and Compliance department.

- An undertaking is in place and taken from the individual or key stakeholder to conduct their responsibilities in such a way that the integrity of CIFA is maintained.

In the course of meetings or activities, Employees/Directors/Consultants/Board members must disclose any interests in a transaction or decision where there may be a conflict between CIFA's best interests and the Employee/Director/Consultants/Board member's best interests or a conflict between the best interests of two organisations that the Employees/Directors/Consultants/Board is involved with.

After disclosure, the Conflicts of Interest Committee (COIC) will be informed. The Employee/Director/Consultant/Board member will not be present in any subsequent discussions and cannot take part in the decision. Any such disclosure and the subsequent actions taken will be noted in the minutes and records kept by the operations department.

If not already done, CIFA will report to OFQUAL any confirmed or potential conflicts where adverse effects have or could arise, following our risk assessment COI process.

If a risk of a conflict of interest is identified for which an immediate decision cannot be made based on existing controls or contingency plans, further investigation will be carried out by the COIC.

A COIC will be convened to review options on how the conflict could be managed. The circumstances of the disclosure may dictate requirements for additional attendees who are not part of the committee but would have relevant knowledge surrounding the identified conflict.

Any personal details will be treated sensitively following the Data Protection Act 2018 (DPA 2018). Additionally, members of the committee who could be involved in the declared potential, or actual, conflict of interest may be excluded from the discussions and the COIC decision-making.



4: Roles and Responsibilities

It is the responsibility of all individuals involved in the design, development, delivery, assessment, or award of our courses and/or examinations, and other associated activities, to meet the obligations of CIFA, our strategies, policies and procedures.

To this end, they:

- conduct their activities so that the aims of CIFA, our strategies, policies and procedures are implemented.
- ensure that they make their role clear and take appropriate steps to separate their role from other functions with which they may potentially be in conflict, as far as possible.
- maintain the integrity and reputation of CIFA.
- recognise and report any potential or existing conflict.

Training needs for individuals or teams will be considered where resolutions or resulting actions require clear structured explanations to be implemented effectively. Line managers are responsible for ensuring their staff are aware of conflicts of interest and the importance of reporting them.

All staff are encouraged to report and disclose any potential conflicts of interest, without fear of reprisal, even if there is doubt over whether it constitutes an actual conflict or not. Please see our Risk Assessments COI document for specifics.

5: Quality assurance, monitoring and review

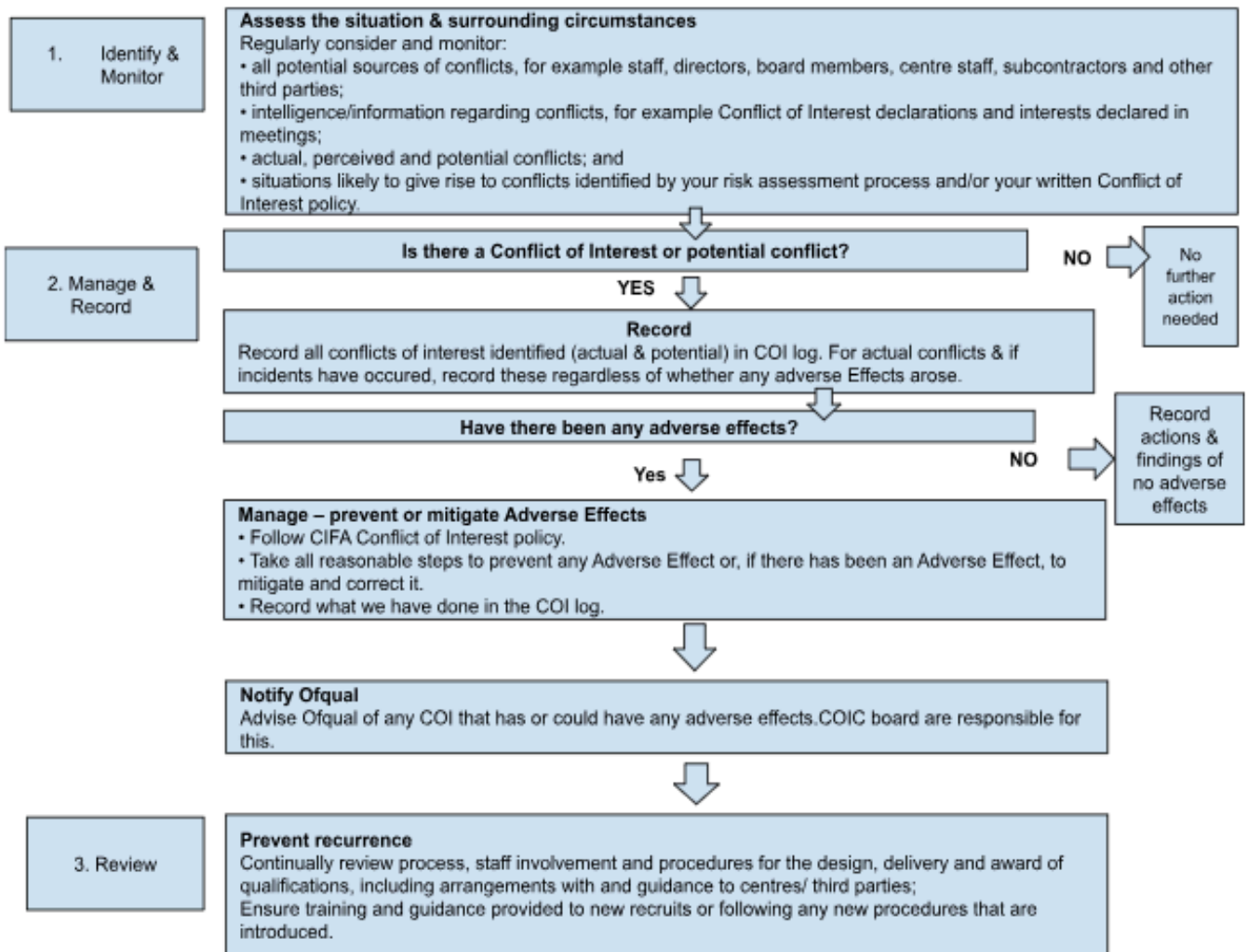
The policy is subject to bi-annual monitoring and review to maintain the highest possible standards of consistency and quality. The reviews are undertaken by the COIC and confirmed with the BOD.

The policy has been developed to comply with all relevant legislation and other relevant regulatory guidance.

This document was last reviewed on 21/02/2025 and will be reassessed and modified as required at least TWICE annually.



Appendix 1 Risk Assessment Process Conflict of Interests





Appendix 2. Conflict of Interest Recruitment

Brief & Purpose:

The Conflict of Interest CIFA Company Policy aims to ensure that employees prioritise the company's best interests and avoid compromising their objectivity or creating conflicts between personal and professional interests. The policy promotes transparency, integrity, and fairness in all business dealings and protects the company's reputation and interests.

Conflict of Interest Company Scope

This policy applies to all employees, contractors, vendors, consultants, and any other individuals or entities engaged in business activities on behalf of the company.

Policy Elements:

1. Definition of Conflict of Interest:
A conflict of interest occurs when an individual's personal, financial, or other interests have the potential to influence their judgment, actions, or decisions to the detriment of the company.
2. Disclosure Requirements:
All employees must disclose any actual or potential conflicts of interest that may arise concerning their role in the company. This includes financial interests, relationships with other organisations, and any personal activities that may affect their impartiality or objectivity.
3. Prohibited Activities:
The following activities are strictly prohibited as they present conflicts of interest:
 - a. Engaging in any business or financial transaction with a competitor, customer, or supplier of the company without prior written approval.
 - b. Accepting gifts, favours, or other benefits that may influence decision-making or create an obligation.
 - c. Holding a financial interest, such as ownership or investment, in any supplier, customer, or competitor of the company without prior written approval.
 - d. Participating in outside business activities that directly compete with the company's interests or interfere with job responsibilities.



- e. Using company resources for personal gain or non-company related activities without authorisation.
- 4. Management of Conflicts of Interest:
CIFA will assess disclosed conflicts of interest on a case-by-case basis. Steps that may be taken include:
 - a. Requesting employees to remove themselves from decision-making processes where a conflict exists.
 - b. Reassigning responsibilities to minimise the impact of conflicts.
 - c. Establishing safeguards and monitoring procedures to ensure objectivity is maintained.
 - d. Terminating contracts or relationships that present significant conflicts that cannot be resolved.
- 5. Reporting and Enforcement:
All employees must report any suspected or actual conflicts of interest promptly. CIFA will investigate reported conflicts thoroughly and take appropriate action, which may include disciplinary measures, up to and including termination of employment.
- 6. Confidentiality and Non-Retaliation:
CIFA will maintain strict confidentiality regarding the reporting of conflicts of interest and will protect employees from retaliation for reporting such conflicts.
- 7. Compliance and Training:
All employees receive training on the Conflict of Interest policy and their obligations under it. Regular compliance reviews will be conducted to ensure adherence to this policy.
- 8. Review and Modification:
This policy is reviewed periodically to ensure its effectiveness and relevance. Amendments may be made as necessary to address new and emerging conflicts of interest.

Employees who violate this policy may be subject to disciplinary action, up to and including termination of employment.

By adhering to this Conflict of Interest Company Policy, we demonstrate our commitment to maintaining the highest ethical standards and preserving the trust and integrity of our business operations.



I, Director/Employee/consultant of **CIFA Education Ltd** solemnly declare that I do not contravene any of the above rules and should there be any possible considered conflicts in the future, I will immediately report to my line manager/director.

Signature

Date

DOC-COIR