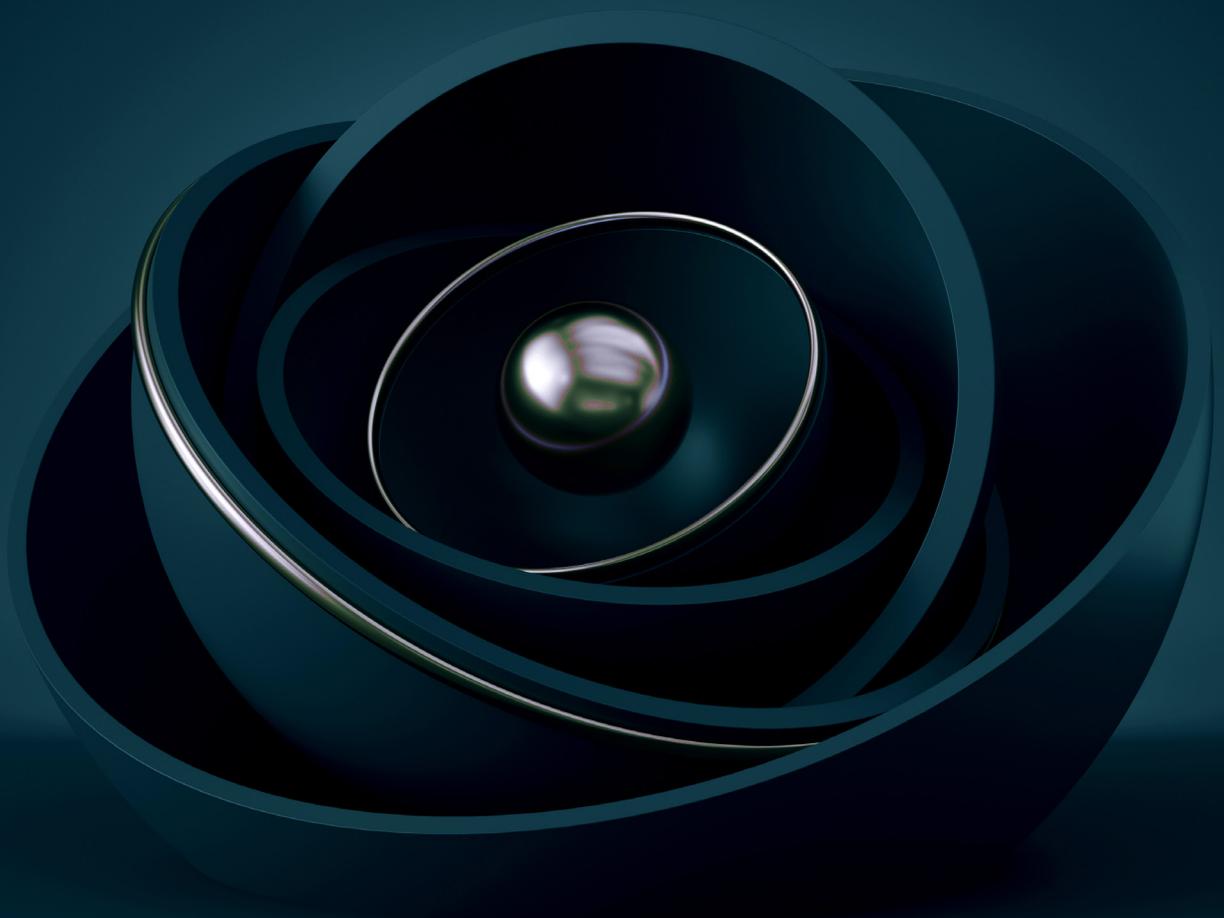




Conflicts of Interest Policy



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1 Definitions

For the purposes of this policy, a conflict of interest exists where:

- (a) CISI's interests in any activity undertaken by it, or on its behalf, have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with its Conditions of Recognition,
- (b) a person who is connected to the development, delivery or award of CISI's qualifications 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 in accordance with CISI's Conditions of Recognition, or
- (c) an informed and reasonable observer would conclude that either of these situations was the case.

A conflict of interest may arise when:

- (i) personal interests in any activity undertaken by an individual, or by a member of the individual's family, have the potential to lead that individual to act contrary to the interests of the CISI and its regulatory obligations in the development, delivery and awarding of qualifications,
- (ii) a person or organisation with which an individual is connected has interests in any non-CISI activity which has the potential to lead that person or organisation to act contrary to the best interests of the CISI in the development, delivery and awarding of qualifications, or
- (iii) an individual offers or receives a gift or inducement from an individual or organisation that might, or might be seen to, place them under an obligation.

In addition to family members, as defined in this policy, a conflict of interest may also arise where an individual has a supervisory or close working relationship with a colleague or with colleagues of their employer, who are studying for or enrolled on an examination for a CISI qualification.

A conflict of interest may arise if an individual, or their family member has or has had a financial interest in, or has been affiliated directly or indirectly with an entity or organisation:

- a) that has been involved in an Agreement or Transaction with CISI, or
- b) that has been involved in an Agreement or Transaction with any CISI Corporate Supporter or Corporate Member, or
- c) whose existing or prospective services or products could be regarded as competitive with those of CISI.

"Family Member" means a parent, grandparent, spouse or domestic partner, child, spouse or domestic partner of a child, sibling, or spouse or domestic partner of a sibling.

"Agreement or Transaction" means any agreement or relationship involving the sale or purchase of goods, services, or rights of any kind; the providing of a loan or grant; or the establishment of any other type of pecuniary relationship with CISI.

2 Scope

This policy applies to all employees, contractors, sub-contractors, exam or appeal panel members, assessors, examiners, item writers, exam invigilators and any other persons or organisations involved in the development, delivery or award of CISI qualifications.

3 Identification

CISI undertakes regular reviews to identify and monitor all conflicts of interest and identify scenarios in which any such conflict of interest may arise in the future.

All individuals identified in section 2 must be alert to the identification of conflicts of Interest, whether actual, potential or perceived. All such conflicts must be declared promptly to a member of CISI Qualifications team and reported to the Assistant Director of Qualifications so that they may be reviewed, and appropriate mitigating action taken.

All staff must sign a confidentiality statement on joining CISI and inform the Assistant Director of Qualifications immediately if there is any change in their circumstances regarding conflicts of interest.

All members of the Exam Board, Qualifications Advisory Boards, and exam panels above are required to sign an annual declaration confirming their agreement to maintain confidentiality of all CISI material and confirming that they have no current or anticipated conflicts of interest arising from their CISI role.

All contractors must sign a confidentiality statement as part of their contract.

All members of an appeal panel are required to sign a declaration confirming their agreement to maintain confidentiality of all CISI material and confirming that they have no current or anticipated conflicts of interest arising from undertaking this role on this occasion.

4 Managing conflicts of interest

CISI aims to ensure that no conflict of interest will have an adverse effect on:

- learners or potential learners
- the ability to develop, deliver and award qualifications
- the standards of qualifications
- public confidence in qualifications.

Where an adverse effect arises from a conflict of interest, CISI will put measures in place to mitigate or eliminate it.

In the event that there is a persistent material conflict of interest which affects the ability of a particular individual to carry out their duties, then the CISI and the individual concerned should consider whether it is in the best interests of the CISI that the individual continue in post.

When identifying actual or potential conflicts of interest, the CISI takes into account whether the conflicted or potentially conflicted individual or organisation involved in the development, delivery or award of its qualifications:

- has an interest in the outcome of an activity;
- is likely to make a financial gain, or avoid a loss;
- has any other financial or non-financial incentive.

In particular, anyone with a personal interest in the outcome is not permitted to be involved in an investigation:

- into potential malpractice
- of suspected or alleged breach of confidentiality.

All reasonable steps are taken to avoid candidates being assessed by anyone with a personal interest in the outcome of the assessment, and where this is unavoidable, to ensure that any part of the assessment that they do undertake is scrutinised by someone else who does not have such an interest.

Anyone with a personal interest in a decision being appealed is not permitted to take a decision on that appeal.

5 Reporting

A Conflicts of Interest Register is maintained by CISI and is reviewed at regular intervals.

Records of actual and potential conflicts of interest will be kept in accordance with the CISI's Retention and Disposal Policy.