



The Institute of Certified Bookkeepers

ICB Conflict of Interest Policy

Contents

1. Purpose of ICB Conflict of Interest Policy	3
2. Definition of a Conflict of Interest	3
3. Scope	4
4. Identifying and recording conflicts of interest	4
Identification	4
Recording	5
Managing and monitoring conflicts of interest	5
Responsibility to ATPS	5
5. Monitoring	6
6. Communication	6
E-mail	6
Telephone	6
In writing	6

1. Purpose of ICB Conflict of Interest Policy

The purpose of this policy is to ensure that all relevant individuals are provided with guidance on handling possible conflicts of interest that may arise within ICB. ICB is committed to protecting the integrity of its decision-making process and to maintain professional standards for the benefit of all its members, students, suppliers, stakeholders and ICB staff, volunteers and committee members. ICB will operate in a way that is considered fair and transparent.

This policy defines what is meant by conflict of interest and describes the role of conflict of interest in the context of working with, or for, ICB.

2. Definition of a Conflict of Interest

ICB considers a conflict of interest to be a situation where an individual, or organisation, has competing interests or loyalties that could adversely influence their judgement, objectivity or loyalty to ICB.

A conflict of interest exists where an individual who is connected to the work of ICB has interests in any other activity which has the potential to lead that person to act contrary to his or her duties relating to ICB, for example:

- Where an individual has a position of authority within one organisation which conflicts with his or her interests in another organisation
- Where an individual has a personal interest that conflicts with his or her professional position
- Where an individual (or friend or relative of that individual) stands to gain either financially or otherwise

Examples of Conflicts of Interest in the context of ICB qualifications and assessments include:

- An individual who is employed by, or carries out work on behalf of, ICB has friends or relatives undertaking ICB assessments/examinations
- The tutoring of candidates by an individual involved in the ICB assessment process
- Invigilators or any other Accredited Training Provider (ATP) staff member is known, associated or affiliated with any learner currently registered for assessment within their ATP

3. Scope

The individuals falling within the scope of the Conflict of Interest policy include:

- Employees
- Board and Committee members
- Volunteers
- Examiners/moderators
- Members
- Students
- Accredited Training Provider (ATPs)
- End-point/Independent Assessors
- Suppliers
- Stakeholders

4. Identifying and recording conflicts of interest

ICB will identify, record and monitor:

- All conflicts of interest which relate to the above, and
- Any scenario in which it is reasonably foreseeable that any such conflict of interest will arise in the future.

Identification

In identifying actual, or in considering whether there is the potential for a conflict of interest, ICB has in place the following measurements to manage and control any such instances:

- Third party contractors will be asked to disclose any conflicts of interest, actual or potential, prior to them being commissioned and will be requested to sign an ICB non-disclosure Agreements (NDAs)

Committees and Groups

- Non-Disclosure Agreements (NDAs), are in place to protect the commercial interests of ICB and are signed by all members of the following:
 - The Board
 - Advisory Council
 - Governing Council
 - Education Review Group
 - Qualification Working Group
 - Appeals Panel

- Centre Review Group
- Diversity and Equality Group
- AML Review Group
- All members of ICB committees and groups are required to complete an Annual Confidentiality and Conflict of Interest Declaration
- All members of ICB committees and groups are required to acknowledge and declare at each meeting whether they perceive an actual or potential conflict of interest in their being present for agenda items; if so, that member is excused for that item
- Should a committee or group member's withdrawal from a meeting coincide with a meeting at which issues are to be voted upon, the Chairperson shall carry the member's voting right

Any individual involved in the delivery of ICB qualifications/assessments who becomes aware of a conflict of interest, must inform the Head of Qualification Standards and Quality Assurance immediately.

Recording

All instances of perceived, actual or potential conflicts of interest will be recorded in the ICB Register of Conflict of Interest and retained by ICB indefinitely.

Managing and monitoring conflicts of interest

ICB will take the following steps to manage any conflict of interest:

- Review instances of actual or potential conflicts of interest, reported in its Register of Conflicts of Interest
- Advise on specific courses of action, which ICB is required to take, to mitigate the Conflict of Interest (where possible)

As part of the monitoring process an annual review of its operations will take place by ICB's Head of Qualification Standards and Quality Assurance. The review will consider any actual or likely conflicts of interest reported throughout the year, what impact the conflict has had on ICB and the resultant mitigating action taken. A report will be presented to the Governing Council on the outcomes of the review and include specific recommendations where ICB should amend its Conflict of Interest Policy.

Responsibility to ATPS

ICB will take the following steps to ensure all ATPs are proactive in identifying and reporting of any conflict of interest. ICB will:

- Ensure all ATPs receive and acknowledge the requirements of the ICB Conflict of Interest policy
- Carry out random sampling, including on-site inspections, to determine the accuracy of information provided by ATPs in relation to conflict of interest
- Request declaration of any conflict of interest at the annual ATP meetings

5. Monitoring

ICB Conflict of Interest Policy is subject to regular monitoring and review to maintain the highest possible standards of consistency and quality.

The Conflict of Interest Policy is formally approved by the ICB Governing Council. Furthermore, the policy has been developed in line with good practice.

6. Communication

Should members, students, suppliers or stakeholders wish to contact ICB regarding this policy, they should:

E-mail

memberservices@bookkeepers.org.uk

info@bookkeepers.org.uk

Telephone

+44 (0) 203 405 4000

+44 (0) 845 060 2345

In writing

Head of Qualification Standards & Quality Assurance

ICB

122-126 Tooley Street

London

SE1 2TU



© The Institute of Certified Bookkeepers 2018

Patron: His Royal Highness Prince Michael of Kent GCVO

Vice President: Leslie T Ellis FICB

122-126 Tooley Street
London, SE1 2TU

+44(0)20 3405 4000
www.bookkeepers.org.uk