



The only awarding body
run *by* counsellors
for counsellors

2024 - 2025

CPCAB Conflicts of Interest Policy



CPCAB Conflicts of Interest Policy

1. Introduction

This policy aims to outline CPCAB's procedures for avoiding potential or actual conflicts of interest as far as possible, to enable stakeholders to have confidence in the integrity of CPCAB as a nationally regulated awarding organisation. Regulatory conditions require CPCAB to identify and monitor:

- all conflicts of interest that relate to it as an accredited awarding organisation
- all conflicts of interest that may arise within its recognised centres; and
- any scenario in which a conflict of interest could arise in the future.

2. Conflicts of Interest Within CPCAB as an Awarding Organisation

A conflict of interest within CPCAB is seen to exist if:

- any of CPCAB's activities could lead it to act against the best interests of the development, delivery and award of its qualifications in accordance with the General Conditions of Recognition;
- anyone involved in the development, delivery or award of CPCAB's qualifications has interests in another activity which could lead them to act against the best interests of the qualifications and their stakeholders;
- a conflict of interest could convey an unfair advantage or disadvantage in respect of any aspect of the qualifications;
- it might appear to a reasonable observer that any of these situations could exist.

As an organisation, CPCAB has governance structures which ensure that the development, delivery and award of its qualifications are not compromised by any other activity carried out by CPCAB and keeps written records of these arrangements. It has arrangements for mitigating or correcting any Adverse Effect¹ that might arise from a conflict of interest.

3. Conflicts of Interest for CPCAB Staff

With regard to members of staff, CPCAB:

- requires all its members of staff, including external consultants, to declare any potential or actual conflict of interest;

¹ Ofqual's definition of an Adverse Effect': 'An act, omission, event, incident, or circumstance has an Adverse Effect if it -

(a) gives rise to prejudice to Learners or potential Learners, or

(b) adversely affects -

(i) the ability of the awarding organisation to undertake the development, delivery or award of qualifications in accordance with its Conditions of Recognition,

(ii) the standards of qualifications which the awarding organisation makes available or proposes to make available, or

(iii) public confidence in qualifications.'

- allocates staff to tasks only where conflicts of interest are identified and avoided/managed appropriately, for example in the allocation of external assessors or selection of staff for a complaints investigative panel;
- where it is unavoidable that someone with a personal interest is involved in the assessment or moderation of a learner, CPCAB ensures that the assessment is subject to scrutiny by another person.

A summary of staff declarations of interest is maintained by CPCAB and updated as required.

4. Conflicts of Interest for CPCAB Centres

With regard to its centres, CPCAB:

- provides guidance on identifying and avoiding conflicts of interest; see [appendix 1](#) of this policy;
- requires centres to complete a declaration to CPCAB to confirm that they have taken all reasonable steps to identify and manage possible conflicts of interest: See form [CR10 on the CPCAB website](#)
- requires a formal declaration of no conflict of interest between staff or candidates when registering every group on the CPCAB Portal;
- monitors centre arrangements for appropriately impartial assessment of learners' work.

This policy is reviewed as necessary and at least annually as part of the documentation update.

CPCAB 2024

Appendix 1

Conflicts of interest can take many forms. Some examples may include:

- A tutor of a lower level course also being enrolled as a candidate on a higher level course.
- Centre staff, e.g. administrators/managers/moderators being enrolled as a candidate on a course.
- A tutor knowing candidates on their courses personally, e.g. friend, relative, colleague.
- A tutor operating as a supervisor or a placement manager to a candidate on their course.

Potential steps to avoid/manage a conflict of interest may include:

- Ensuring all internal course documents are password protected and only accessible to current tutors at that level.
- Ensuring that a second tutor co-teaches a qualification and is available to assess the work of a candidate known to the core tutor.
- Ensuring an impartial moderator is available to scrutinise any assessment decisions taken by a tutor in relation to a candidate known to them.
- Drawing up confidentiality agreements with third parties to ensure the correct management of sensitive information.
- Allocating candidates to an alternative group or referring to an alternative centre if a conflict of interest cannot be managed.

This is not an exhaustive list but may be helpful when you are considering if a conflict exists. While dual roles are not always avoidable, it is important to document how you will manage any potential conflicts in order to mitigate their effects. Where centres are implementing a management plan related to a conflict of interest they must complete a [CR10 form](#) and send this to exams@cpcab.co.uk for review. They should keep copies of completed CR10 forms and make this information available to their External Verifier.