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1. Scope

All activity carried out by Van Elle as a CITB Approved Training Organisations (ATO) and approved centre network including Site Safety Plus (SSP), Construction Plant Competence Scheme (CPCS) and Internet Test Centres (ITC). Including but not limited to the following relationships:

- Senior quality consultant or CITB representative that has an interest or history with Van Elle Training;
- Senior quality advisor or CITB representative that has a relationship with an individual at Van Elle Training;
- Van Elle Training Centre staff who have a relationship with a candidate, delegate or operative;
- Van Elle Training Centre staff who have a relationship with each other;
- Van Elle Training Centre staff that have a commercial interest in the assessment outcome.

2. Introduction

Van Elle works with CITB and has links with other bodies, whether CITB departments, commerce, industry, and others.

It is possible that these links may give rise to potential conflicts of interest. Van Elle is therefore prepared through this policy to detail how conflicts of interest will be managed and reported to CITB and what Van Elle must do to be compliant.

This policy has been developed to ensure the integrity of courses, cards, tests and assessments assured by CITB are upheld.

3. Definition

It is not possible to provide a comprehensive definition of the kind of circumstances which will give rise to a conflict of interest, but the following are examples of the most likely situations that will lead to perceived conflicts of interest.

In any situation where an employee is uncertain as to the propriety of a given arrangement, advice should be sought from the Training Manager or Quality and Verification Manager at CITB.

A conflict of interest may be defined as a conflict between Van Elle as the ATO/centre and their delegates/candidates where the centre staff and candidate have a personal relationship which could weaken the assessment/testing/training and quality assurance process, and the integrity of certificates/cards and outcomes subsequently issued.

Additionally, the conflict could arise if the centre staff involved in the assessment/testing/training and quality assurance process are related, and in a position to influence CITB business for actual or potential professional or personal benefit through its activity.

Conflicts of interest are not restricted to cases in which an individual actually derives some advantage. They also arise and can be equally damaging where a conflict exists or appears to exist without any consequential behavioural impact.

This policy does not imply any lack of trust in its Training Centre staff. Moreover, it is designed to protect them against criticism by ensuring that they recognise and disclose such conflict situations and take steps to avoid and/or manage them as they arise.

4. Disclosure and review

The following outlines the responsibilities of the parties involved in resolving the conflict(s).

It is the duty of all Van Elle employees to disclose any actual or potential conflict of interest.

Any employee who believes they have a conflict or potential conflict of interest should consult their line manager or Training Manager.

Conflicts of interest should be reported to their line manager or Training Manager immediately. The record of disclosure shall cover:

- the type of potential conflict;
- the nature of the activity;
- a description of all parties involved;
- the potential financial interests and rewards; and
- any other information which the employee feels necessary to evaluate the disclosure.

In the light of any disclosure, line manager, the Training Manager may need to consult the Group Director as appropriate.

After appropriate evaluation, it may be determined that a proposed or ongoing agreement and the employee's personal interests show no conflict or apparent conflict and are acceptable without further review.

Conversely, it may be determined that some questions of propriety requiring a higher level of review have been identified. For each situation, the conflict register must be completed to demonstrate due diligence has been exercised and the conflict managed.

If the conflict directly impacts on

- assessment;
- testing;
- training;
- quality assurance activity; or
- administration requirements (certification, claiming of funding, claiming of learning outcomes),

Van Elle must demonstrate that they have identified potential conflicts of interest and have managed the risk. This may include

- clear role separation of updating the Construction Training Register with achievement date and training delivery;
- clear role separation of quality assurance and training delivery;
- avoidance of training delivery to employees by direct line managers/supervisors or family members.

Any agreed actions can then be monitored as needed. Only situations not included in these procedures then need to be identified to a CITB quality representative and be recorded for audit purposes.

These records must be available to CITB on request.

If reasonable steps cannot be taken to mitigate the identified risk, the CITB quality representative must be notified prior to the activity taking place. This is to allow guidance to be provided and steps taken to mitigate.

5. Appendix 1: Exemplar recording document

Date	Name	Conflict description	Management measure action

Mark Cutler

Signed
Mark Cutler - Chief Executive Officer

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