

TRAINING PROVIDER NETWORK

Conflict of interest policy



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Scope

All activity carried out by the CITB's Training Provider Network including Site Safety Plus, and Internet Test Centres. Including but not limited to the following relationships.

- Senior Quality Consultant or CITB representative that has an interest or history with a training provider.
- Senior Quality Consultant or CITB representative that has a relationship with an individual at a training provider.
- Provider Staff who have a relationship with a delegate or operative.
- Provider Staff who have a relationship with each other.

Introduction

CITB works with several training providers, and has links with other bodies, including other internal departments, industry, qualification regulators and many others.

It is possible that these links may give rise to actual and/or potential conflicts of interest. CITB details in this policy how it will manage, mitigate, and report conflicts of interest and what training providers must do to be compliant.

This policy has been developed to protect the integrity, reliability and reputation of the CITB Training Provider Network and the courses, achievements, tests and assessments delivered by members of the CITB training provider network.

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 situations that will lead to conflicts of interest.

In any situation where an individual or training provider is uncertain as to the propriety of a given arrangement, CITB's Approval and Compliance Manager will be happy to provide advice and guidance.

A conflict of interest can be defined as CITB staff, and approved training providers, as follows.

- **CITB Staff**

A conflict between the official representative of CITB and any organisation where the individual may have a conflict or an interest, for example, where the individual may influence another party for actual or perceived personal benefit, or to benefit family member at the expense of CITB or another organisation.

Conflicts of interest are not restricted to cases in which an individual derives some advantage. They also arise and can be equally damaging where a conflict exists or appears to exist without any consequential behavioural impact. CITB policy on conflicts of interest does not imply any lack of trust in its 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, manage and/or mitigate the situations as they arise.

- **Approved Training Providers**

A conflict between the training provider and their delegate(s) where the training provider staff and delegate(s) have a personal relationship which could weaken the reliability and the integrity of the outcome.

Additionally, the conflict could arise if the training provider 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 derives some advantage. They also arise and can be equally damaging where a conflict exists or appears to exist without any consequential behavioural impact. CITB policy on conflicts of interest does not imply any lack of trust in its approved training providers, moreover, it is designed to protect them against criticism by ensuring that they recognise and disclose such conflicts of interest and take steps to avoid, manage and/or mitigate them as they arise.

For Internet Test Centres, the test invigilators and administrators should avoid a conflict or perceived conflict, which can be defined as a situation in which a person has a private or personal interest, sufficient to appear to influence the test result, for example, an administrator's family member or a company employee.

It is however acknowledged that for colleges or other internet test centres that solely test their own students or company employees, that the test administrator may know the delegate, and in practice may be unavoidable, the internet test centre should mitigate risk with the selection of the invigilator (where possible) to avoid any suggestion that there is a conflict of interest for the test.

Details of any conflict of interest must be recorded, in line with the policy, on the conflict of interest and a log and be made available to the CITB quality team for audit on request. If the conflict of interest is considered too high to mitigate, the delegate should test at a neutral venue.

Self-Proctor - Self-Proctor is different to a Conflict of Interest. The internet test centre must ensure no self-proctored tests are undertaken. This means the registered Chief Administrator or Administrator cannot launch and administer their own test.

Pearson Vue will always make CITB aware of any instances of Self-Proctor, which will result in a suspension of testing.

Disclosure and Review

CITB Staff

It is the duty of all employees of CITB 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 the Approval and Compliance Manager.

Conflicts of interest should be reported to the Line Manager and Approval and Compliance Manager immediately. The record of disclosure shall cover the type of 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, the Approval and Compliance Manager may need to consult the Head of Quality and Standards as appropriate.

After appropriate evaluation, it may be determined that a conflict of interest shows no conflict or apparent conflict and are acceptable without further review. Conversely, it may be determined that the conflict of interest requires a higher level of scrutiny. For each situation, the conflict register must be completed to demonstrate due diligence has been exercised and the conflict managed and mitigated where appropriate.

CITB staff must also disclose gifts and gratuities on the appropriate form to the CITB governance team. This policy does not replace any element of the annual declaration or other declaration requirements.

Training Providers

Approved training providers must demonstrate that they have identified conflicts of interest and have a policy of managing the risk.

Where the conflict directly impacts on the assessment, testing, training or quality assurance process, CITB's quality representative must be notified prior to any assessment, test, training or quality assurance taking place.

The approved training provider must have systems in place to manage and record (appendix 1 is provided as an exemplar) the conflict of interest and mitigate the risk. This must be auditable by CITB on request.

Appendix 1

Exemplar Recording Document

[illegible]

