



28. Conflicts Of Interest And Financial Controls

Owner: Directors | Applies when spending, charging fees, recruiting or receiving funding

Declare actual, potential and perceived conflicts involving relatives, personal relationships, gifts, outside roles, suppliers or financial interests. Keep a register and update it when circumstances change. A conflicted person must not improperly influence selection, purchasing or complaints; record withdrawal and the independent decision.

Use approved budgets, invoices/receipts and an auditable payment trail. Set written approval thresholds [insert] and require a second authorised reviewer for significant or connected-party spending. No one approves their own expenses. Verify bank-detail changes through a trusted independent channel; reconcile accounts regularly and restrict access.

Record course income and refunds accurately. Apply grant restrictions and keep evidence of eligible spending. Do not mix GOF funds with personal accounts. Report suspected fraud immediately through the director/independent whistleblowing route and preserve evidence. Follow the governing document and relevant company/CIC requirements if applicable.