ICPHAA

Irish Counselling, Psychotherapy & Allied Healthcare Professionals Association

MEMBERS' PROFESSIONAL PRACTICE

Conflict of Interest Policy

How ICPHAA members, and those who make decisions for the Association, identify, declare and manage conflicts of interest so that clients come first and decisions are fair.

REFERENCE	ICPHAA-POL-05	VERSION	1.0
EFFECTIVE	9 November 2026	NEXT REVIEW	9 November 2027
POLICY OWNER	ICPHAA Board of Directors		

MEMBERS' PROFESSIONAL PRACTICE · ICPHAA-POL-05

Conflict of Interest Policy

APPLIES TO	All ICPHAA members in their professional practice, and the Board, Registry, Accreditation Department and anyone else acting or deciding on ICPHAA's behalf.
VERSION	1.0 · effective 9 November 2026 · next review 9 November 2027
POLICY OWNER	ICPHAA Board of Directors
CONTACT	ICPHAA Registry · admin@icphaa.ie

AT A GLANCE

- A conflict of interest can be actual, potential or perceived; all three need attention.
- Members put the client's interests first and do not use the therapeutic relationship for personal, financial or professional gain.
- Conflicts are identified early, discussed in supervision, explained to the client where appropriate, and recorded.
- People acting for ICPHAA declare relevant interests and take no part in decisions where they have a conflict.
- Unmanaged or undeclared conflicts may be considered under the Complaints, Fitness to Practise or Disciplinary procedures.

CONTENTS

1 Purpose 2
2 Scope 3
3 What is a conflict of interest 3
4 Conflicts in professional practice 3
5 Gifts, hospitality and referral fees 4
6 Managing a conflict in practice 4
7 Conflicts in ICPHAA decision-making 5
8 Responsibilities 5
9 Breaches and concerns 6
10 Monitoring and review 6

1. Purpose

Clients trust counsellors, psychotherapists and allied healthcare practitioners to act in their best interests. The public and members trust ICPHAA to make fair, impartial decisions about membership, accreditation and complaints. Both kinds of trust are damaged when personal, financial or professional interests are allowed to influence judgement, or appear to do so.

This policy explains what a conflict of interest is, gives examples of situations that commonly arise in practice and in the governance of the Association, and sets out how conflicts are to be identified, declared, managed and recorded. It supports the principles of fidelity, non-maleficence and justice in the ICPHAA Code of Conduct for Members.

2. Scope

This policy applies to:

- every ICPHAA member, in every membership category, in their work with clients, supervisees, trainees, colleagues and organisations;
- members of the ICPHAA Board of Directors;
- staff of the ICPHAA Registry and the Accreditation Department, including the Accreditation Manager;
- assessors, reviewers, volunteers and anyone appointed to consider a complaint, appeal or fitness to practise matter on behalf of ICPHAA;
- training providers and other organisations in a formal relationship with ICPHAA, in so far as their dealings with the Association are concerned.

3. What is a conflict of interest

A conflict of interest arises where a person's duty to act in the interests of a client, or to make an impartial decision for ICPHAA, is, or could be, affected by another interest or relationship.

- **Actual conflict.** The other interest is already affecting, or directly bears on, a decision or relationship.
- **Potential conflict.** Circumstances could reasonably develop into an actual conflict.
- **Perceived conflict.** A reasonable observer could believe that judgement is affected, even if it is not.

Relevant interests may be financial (fees, business ownership, commissions, investments), personal (family, friendships, intimate relationships), professional (employment, other roles, competing services) or reputational. Interests of close family members and business partners can create conflicts in the same way as a person's own interests.

Having an interest is not in itself wrong. What matters is that it is recognised, declared and managed openly.

4. Conflicts in professional practice

Situations that commonly give rise to conflicts for members include:

- **Dual or multiple relationships** with clients, for example where a client is also a friend, relative, colleague, employee, tenant, customer or business contact, or where the member and client move in the same social, sporting, religious or community circles. These require particular care in rural practice and small communities.

- **Financial arrangements** beyond the agreed fee, such as borrowing from or lending to clients, bartering services, involvement in a client's business or will, or selling clients products or services outside the therapeutic contract.
- **Referral arrangements**, including paying or receiving referral fees or commissions, or steering clients towards a service in which the member has an undisclosed interest.
- **Overlapping roles** in training and supervision, for example a trainer who is also a trainee's therapist, a supervisor who is also the supervisee's line manager, or an assessor who has a personal relationship with the person being assessed.
- **Employer or third-party pressure**, where an employer, insurer, funder or referrer seeks information or outcomes that may not be in the client's interests.
- **Research and publication**, where a member's research interests could influence how a client is treated or how their material is used.

Sexual relationships with clients are not a conflict to be managed: they are prohibited, as set out in the ICPHAA Code of Conduct for Members.

5. Gifts, hospitality and referral fees

Members should think carefully before accepting gifts from clients. A small token offered at the end of therapy or at a festive time may be accepted where refusing would cause hurt and where there is no risk of influence. Gifts of significant value, cash, repeated gifts, or gifts that might create a sense of obligation should be declined sensitively. Members should discuss any doubtful case in supervision and record gifts that are accepted.

Members must not give or receive payment, commission or any other benefit in return for referring clients. Where a member refers a client to a service in which they have an interest, they must tell the client and offer alternatives.

People acting for ICPHAA must not accept gifts or hospitality from applicants, training providers or members that could be seen as an attempt to influence a decision. Any gift or hospitality offered in connection with an ICPHAA role should be declared to the ICPHAA Registry.

6. Managing a conflict in practice

When a member identifies an actual, potential or perceived conflict, they should take the following steps:

1. Recognise the conflict as early as possible, ideally before work begins, and keep relationships under review as circumstances change.
2. Discuss it with their clinical supervisor and consider its likely effect on the client and on the member's objectivity.
3. Where appropriate and safe, explain the situation to the client, including any risks, so that the client can make an informed choice.

4. Decide, with supervision, whether the conflict can be managed safely (for example by agreeing clear boundaries) or whether it should be avoided, which may mean declining or ending the work and offering an appropriate referral.
5. Record the conflict, the advice received, the decision reached and the reasons.
6. Review the arrangement regularly and act promptly if the conflict begins to affect the work.

Where there is doubt, the client's welfare takes priority, and the safer course is to avoid the conflict.

7. Conflicts in ICPHAA decision-making

Decisions about membership, accreditation, complaints, fitness to practise and discipline must be, and be seen to be, impartial. Everyone involved in those decisions on behalf of ICPHAA must:

- declare relevant interests when they take up their role and update the declaration when circumstances change;
- declare any conflict relating to a particular matter as soon as they become aware of it, and before any discussion or decision;
- take no part in the discussion or decision where they have a conflict, unless the Board, having considered the declaration, decides that the interest is not material;
- not use information obtained through their ICPHAA role for personal or business advantage.

In particular, a person who has a personal, professional or financial connection with an applicant, a member under review, a complainant or a training provider must not assess, investigate or decide that matter. Where a Board member or officer has an interest in a training provider or other organisation that seeks or holds ICPHAA accreditation, or is in a formal relationship with ICPHAA, that interest is declared and recorded, and the person takes no part in decisions about that organisation.

ICPHAA keeps a record of declared interests, and declarations made at Board meetings, together with the action taken, are recorded in the minutes in line with the Records of Decision Policy.

8. Responsibilities

Members are responsible for recognising conflicts in their own practice, seeking supervision, being open with clients where appropriate, and keeping records of how conflicts were managed.

Supervisors are responsible for helping supervisees identify and think through conflicts, and for being alert to conflicts within the supervisory relationship itself.

Board members, Registry and Accreditation Department staff, assessors and panel members are responsible for making and updating declarations and for withdrawing from decisions where they have a conflict.

The ICPHAA Board of Directors is responsible for maintaining the record of declared interests, deciding how declared conflicts in governance are to be managed, and keeping this policy under review.

9. Breaches and concerns

A member who fails to recognise or manage a conflict that harms, or risks harming, a client may be in breach of the ICPHAA Code of Conduct for Members. Concerns may be considered under the Complaints Procedures and, where relevant, the Fitness to Practise Policy and Disciplinary Procedures.

Failure by anyone acting for ICPHAA to declare a material interest is a serious governance matter. A decision affected by an undeclared conflict may be reviewed and, where necessary, taken again by people without a conflict.

Anyone with a concern about a conflict of interest, whether involving a member or someone acting for the Association, can contact the ICPHAA Registry at admin@icphaa.ie. Concerns about the Board itself may be raised in writing with the Board. Those raising concerns in good faith are protected in line with the Protected Disclosures Act 2014 (as amended), where it applies.

10. Monitoring and review

The ICPHAA Board of Directors owns this policy and reviews it at least annually, or sooner where changes in law, regulation or professional practice require it. The Board also reviews the record of declared interests at least once a year. The current version is available at www.icphaa.ie.

READ ALONGSIDE

- ICPHAA Code of Conduct for Members
- Supervision Policy
- Organisational Integrity
- Records of Decision Policy
- Complaints Procedures
- Disciplinary Procedures

DOCUMENT CONTROL

VERSION	DATE	CHANGE	APPROVED BY
1.0	9 November 2026	Reissued in the ICPHAA policy framework (replaces the former ICPA version).	ICPHAA Board of Directors

Support · Develop · Empower