



## **Conflict of Interest Policy**

**November 2019**

## Purpose

The purpose of this policy is to protect our integrity as a business and the integrity and validity of our assessment service. It is designed to support our colleagues by providing guidance on handling possible conflicts of interest that may happen as a result of our role as an end-point assessment organisation (EPAO).

This policy:

- Defines what is meant by conflict of interest
- Provides examples of conflicts of interest that may arise
- Sets out our commitment to manage conflicts of interest across all areas of the business
- Describes the process for managing conflicts of interest and disclosures

## Definition

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

The conditions for organisations on the register of end-point assessment organisations state:

- Where a potential conflict emerges you must take appropriate action to ensure the integrity and validity of end point assessments you deliver is not compromised
- This may mean removing individuals from any involvement in the assessment process where there is a risk of conflict
- Any actual or perceived conflict of interest will undermine both the outcome of the end-point assessment and your credibility

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## Examples of Conflicts of Interest

It is not possible to provide a definitive list of examples of conflicts of interests, but the following are examples of situations that could lead to actual or perceived conflicts of interest:

- Where the training delivery function and the EPAO rest within one organisation
- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation
- Where someone works for or carries out work on our behalf, who has friends or relatives taking our assessments or exams
- When an individual has interests that conflict with his or her professional position
- Where someone works for or carries out work on our behalf, but may have personal interests - paid or unpaid - in another business which either uses our products and services, or produces similar products
- Where an individual/organisation is undertaking the end-point assessment of apprentices for an organisation, within which they have previously trained, managed or assessed the same apprentice(s), during the 'on-programme' phase of their apprenticeship

## Our Commitment

- There will be a clear separation of individuals, processes, policies and roles and responsibilities between the training and the assessment arm of the organisation
- No individual involved in the on-programme delivery will be involved in end-point assessment for the same individual or group of apprentices
- We will not deliver on-programme training and end-point assessment for the same group of apprentices for the same standard
- We will not collude with other EPAO's, providers or employers in the delivery of end-point assessment
- We will not actively offer or accept incentives or inducements to or from employers and providers in connection with our engagement to deliver end-point assessment

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## Process

It is the duty of all colleagues to disclose any actual or potential conflict of interest, and the process for doing this is documented below:

- All EPA colleagues will complete a conflict of interest form on being assigned an apprentice. It is their responsibility to declare any individual or organisational conflict of interest. This will be reviewed by the Centre Manager (or Head of Assessu if the CM is the named IEPA) and where there is an actual or perceived conflict this will be recorded on a register of interests. In such cases the apprentice will be re-assigned to another IEPA and a same process followed until it is certain there is no individual or organisational conflict of interest.
- The information held on the conflict of interest form is then transferred to a register of interests document held by the Responsible Officer
- If the individual concerned has any changes to their declared circumstances, they must inform their line manager immediately in writing, so that the conflict of interest can be evaluated, and the register updated
- The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept.
- Any colleague considering paid or unpaid work outside the business should inform their manager if they think there is any potential for a conflict of interest. If the colleague is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the Responsible Officer if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A colleague must not take on any such activities that could be deemed to compete or conflict with our assessment activities.
- The Responsible Officer is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the Board and the regulatory authorities.

## Management and mitigation of possible risks in using End Point Assessors with dual roles

To ensure a clear separation of roles for deploying end point assessors with a dual role (Internal Quality Assurer/Development Coach) within the Remit group, the following processes are in place:

- Distinct job description for the role of EPA (Associate and Full time)
- Robust and impartial recruitment and selection conducted solely by Assessu managers
- Independent and full Assessu induction to ensure full understanding of Assessu's expectations, processes and policies, including conflict of interest prior to being assigned apprentices

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- Prior to appointment, agreement in writing from existing line management approving team members to take on an End Point Assessor role
- Discrete line management by the Centre Manager for performance as an Assessu employee
- Assessu email address so all written associated with EPA is separate and confidential
- Signed contract held by HR agreeing to uphold their professional integrity as EPA for Assessu
- Conflict of interest declarations for each apprentice (see above) reviewed by the Centre Manager/Head of Assessu
- Written guidance outlining expectations and professional conduct
- 100% quality assurance sampling of assessment decisions where a perceived interest may undermine the credibility and reliability of assessment decisions.

## Version Control

Date	Section(s) amended	Brief description	Author
21/03/18	New policy	New EPAO policy	K.Gundle
01/11/19	Process for EPAs with dual roles	To reflect ESFA conditions section 6 Conflict and Collusion (April 2019)	Karen Green
29/01/2020	Amend to process	To review and sign off COI declarations	Karen Green

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