

Apprenticeship End Point Assessment - Conflict of Interest Policy

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Purpose

1. This document sets out the policy and procedures governing the management of conflicts of interest related to apprenticeship end point assessments (EPA) delivered by the University for employers.
2. For every end point assessment, whether integrated or where the University is the EPA organisation to other institutions for non-integrated provision, the University is required to deliver an independent, objective assessment of the knowledge, skills and behaviour as set out in the relevant Apprenticeship Standard for every apprentice.
3. The purpose of this policy is to demonstrate that the University understands and meets these conditions and provides a framework for staff to identify, manage and mitigate any potential conflict of interest that may occur in relation to EPA.
4. This policy:
 - defines what is meant by ‘conflict of interest’
 - sets out the key principles for managing potential conflicts of interest in the context of delivering EPA
 - specifies responsibilities for managing conflict of interest at individual, departmental and organisational level.

Overview

5. This policy covers the delivery of all apprenticeship EPAs undertaken by the University, internally as part of a University delivered apprenticeship programme or as an independent EPA organisation.
6. The University, as an organisation accountable and responsible for facilitating completion of the EPA, and the individual assessors and invigilators that the University use, must be free from any conflicts of interest that could adversely affect their judgement or objectivity in administering and undertaking a robust and consistent EPA. The University must ensure that no individual undertaking the EPA is involved in or is responsible for any on-programme delivery, line-management or on-programme assessment of the same apprentice, or has any personal, professional or business connections to those apprentices undertaking the EPAs.

Definition of Conflict of Interest

7. A conflict of interest (Col) is a situation in which an individual, or organisation, has competing interests or loyalties which could compromise, or appear to compromise, the outcome of an EPA if it is not appropriately managed. Possible scenarios where a conflict of interest may occur include:
 - the University is involved in both the EPA and the training delivery of an Apprenticeship Standard
 - an individual may be employed by the University and has links with and/or is also employed in the same organisation as the apprentice
 - when an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation
 - an individual involved in EPA has a prior link with the apprentice or their employer for the Apprenticeship Standard they are assessing against. For example, they may have friends or relatives working with the apprentice, or who have delivered the teaching elements of the apprenticeship
 - where an individual working on the EPA has personal interests – paid or unpaid – in the employer organisation undergoing the EPA
 - at both organisational and individual level, the official role of the individual/organisation undertaking the EPA has any other interests that may compromise their assessment decisions
 - where an individual participating has a personal or business gain from the outcome of the assessment
 - where an individual undertaking the EPA of apprentices for an organisation within which they have previously worked, trained, managed or assessed the same apprentice.

Scope

8. This policy applies to all staff, consultants and partner institutions/provider organisations taking part in or supporting an EPA as defined above. This includes individuals involved with any aspect of the delivery of an EPA, and also in the creation, marketing, sales, distribution, marking or any other activity connected with tests and assessments, resources or services used within the EPA.

9. Explicitly included in scope for this policy are all employees, contractors, agency or associate staff, including assessment associates, verifiers/examiners and other support roles involved in the EPA process and outcome. This list is not exhaustive. Every individual must complete a Declaration of Interest (DoI) form (set out at Annex A) when asked to do so, and the University will assess the risk and impact based on each set of circumstances.
10. Where mitigating action is needed as a result of a declaration on a DoI form, this may mean that an individual will not be able to take part in a specific EPA. The Head of Department and/or Head of School (if the HoD is responsible for the operationalisation of the EPA) will consider whatever action is needed to protect the objectivity and integrity of the EPA.

Principles

11. The Academic Registrar is responsible for the Conflict of Interest policy and guidance, and this responsibility includes the annual review of policy and process.
12. Schools are responsible for the briefing and training of staff and for the management and decisions regarding conflicts of interest, and the action taken regarding potential and actual instances of conflict of interest. A breach of the Conflict of Interest policy must be reported in writing by the Head of School to the Academic Registrar. The policy and any occurrences or breaches will be reviewed annually by the ASQEC Apprenticeship Programmes Sub-Committee.
13. As an EPA organisation, the University will:
 - ensure that University apprenticeship delivery operates in a way that does not conflict with University responsibilities as an EPA assessment organisation
 - review EPA processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved
 - ensure that the contractual arrangements with assessment associates clearly set out any obligations on them to manage conflicts of interest arising from other activities that they undertake
 - ensure that anyone who has access to confidential assessment material for a qualification is not permitted to deliver or be present at teaching activity related to that qualification
 - ensure that members of staff involved in EPAs declare any interest regarding friends or family taking upcoming EPAs where the University is the EPA organisation.

Responsibilities

Heads of Department and Heads of School

14. Heads of Department are responsible for early identification of, and planning for, conflict of interest as part of their responsibilities and the planning for every individual EPA.

15. Heads of Department are responsible for ensuring that all organisations and individuals contributing to an EPA are clear on the impact of the policy on their roles and for full implementation of the policy.
16. Heads of Department must ensure that all individuals (as defined in paragraphs 8 and 9) complete DoI forms prior to each EPA. Where needed the Head of Department must implement mitigating actions, agreed with the Head of School as appropriate, before the EPA commences.
17. Where an EPA is to be hosted at the employer or provider organisation premises the Head of Department must, as part of the planning process, review any Col risks and, where identified, set out the actions required to avoid potential conflicts of interest in the EPA plan. This must be documented and evidence that this has been implemented must be included in the EPA record.
18. Individual DoI forms must be stored with the School and available as part of internal and external audits.
19. Heads of Departments are responsible for briefing any provider organisations, contractors, consultants, agency or other workers not employed by the University, for completion of the EPA DoI Form and agreeing mitigation action as required, liaising with the Academic Registrar, as necessary. They must ensure that only the agreed contract template, which includes a requirement to uphold this policy, is used between both organisations, or individuals and the University. All contracts and DoI forms must be in place before the start of the EPA.
20. Heads of Department are responsible for ensuring that staff have read this policy and received conflict of interest briefings. No individual may take part in the EPA process until this has taken place.
21. Heads of School are responsible for escalating reports of actual or potential conflicts of interest, when necessary, to the Academic Registrar.

Individuals

22. Individuals are responsible for ensuring that they are familiar with the Conflict of Interest policy and have completed any required conflict of interest briefing or training before undertaking an EPA.
23. Every individual (as described in paragraphs 8 and 9 above), is responsible for notifying the Head of Department proactively about any Col before each EPA starts using the Declaration of Interest Form (Annex A).
24. Individuals must also notify if, at any point, a conflict of interest arises which is not reflected in their DoI form, or where a Col has not previously been registered. It is the responsibility of all staff, consultants, partner institutions and provider organisations to protect the independence of the apprenticeship assessment process, and both comply, and support others to comply, with these guidelines.
25. Potential or actual conflicts of interest should be documented within team meetings or management meetings. The Head of Department/Manager must either resolve the

issue or, for issues that cannot be resolved at this level, report the issue to the Head of School. Records are required to be available for audit purposes.

26. An individual may wish to raise concerns relating to a Col directly with the Head of School. This may be done in confidence and they are entitled to receive a response to their concerns. See the University Whistleblowing Policy for further information.
27. Any staff member involved in EPA, considering paid or unpaid work outside the University should inform their Manager if they think there is any potential for a Col. If the staff member is unsure whether a Col might arise, they should discuss this with their manager first. The Manager should speak to the Head of Department or Head of School as appropriate if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that may be deemed to compete or conflict with the University's activities in relation to EPA.

Related Polices, Documents or Webpages

28. This policy should also be read in conjunction with the following policies and documents, which are available via the following links:
 - [Whistleblowing Policy](#)
 - [Student Complaints procedure](#)
 - [Complaints Policy & Procedure for Employers for Apprenticeships](#)
 - [Data Protection Policy](#)
 - [ESFA Conditions for Organisations on The Register of End-Point Assessment Organisations](#) (Published 11 April 2019, updated 28 June 2019).
29. For further information, advice and guidance please contact the Apprenticeship Office.

Approval/Review Table

Item	Notes
Version Number	v1.0
Date of Approval	February 2020
Approved by	Academic Board
Effective from	February 2020
Policy Officer	Academic Registrar
Department	Registry Services
Review date	July 2021
Last reviewed	N/A
Equality Impact Assessment (EIA)	N/A
Accessibility Checked	On 28.2.20

Annex A End Point Assessment - Declaration of Interest Form

This declaration confirms the relationship and interests of staff members involved in End Point Assessments (EPA) that the University undertakes as part of an apprenticeship programme. Every individual involved in the EPA is required to review and declare with respect to the provider organisation and the organisations the apprentices are employed by, as set out below:

- any professional, personal, financial, familial or other link or interest
- any professional, financial, familial or other personal interests of spouses, partners or close family members.

Guidance

1. This form should be completed in accordance with the End Point Assessment - Conflict of Interest Policy.
2. Declarations must describe the interest clearly and confirm whether this is a direct interest, in that it relates to the staff member or an indirect interest, in that it relates to a family member or professional or business associate of the staff member.
3. Completed documents should be returned to the Head of Department.

Provider Organisation [where this is UW state School where EPAO will be hosted]	
Employer Organisation(s)	[List of organisations apprentices are employed by to be provided by School Head of Department]
Apprenticeship Standard	

'NO INTEREST' DECLARATION	I can confirm that neither I, nor my spouse, partners or other family members or close business associates have any conflict of interest with the provider organisation(s) named above		
	I can confirm that neither I, nor my spouse, partners or other family members or close business associates have any conflict of interest with the apprentices or the employer organisation		
Signed		Date	
Name			

DECLARATION OF INTEREST		I can confirm that my interests, and those of my spouse, partner and other family or business interests in the organisations named above, are as set out below:	
Signed			Date
Name			
Direct	Indirect	Nature of interest (Continue on a separate sheet if necessary)	
Spouse, Partner or Close Family Members or Business Associates (Continue on a separate sheet if necessary)			
Name		Their relationship to staff member	Nature of Interest

ACTION	No Conflict: No action required		
	Conflict: Reassign		
	Conflict: Mitigating Action (see below)		
Signed [Head of Department/Head of School (if the HoD is the EPA manager)]		Date	
Name			
Mitigation			
1			
2			
3			
4			