

CONFLICT OF INTEREST POLICY FOR APPRENTICESHIP END POINT ASSESSMENT

Introduction

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.
2. For every end point assessment which is integrated, the University is required to deliver an independent, objective assessment of the knowledge, skills and behaviours as set out in the relevant Apprenticeship Standard for every Apprentice, thereby ensuring the integrity of the apprenticeship programme and the associated apprenticeship award. This includes ensuring that there is a clear separation between apprenticeship programme delivery and the conduct of the EPA.
3. This policy is designed to enable the University to identify, manage and mitigate any conflicts of interest, both perceived and actual, when engaging individuals in apprenticeship programme delivery and in the development, administration, delivery and marking of EPAs.

Overview

4. This policy covers the delivery of all integrated apprenticeship EPAs undertaken by the University.
5. The University, as an organisation approved by the ESFA to undertake EPAs is accountable and responsible for ensuring that 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. As such 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 EPA.

Definition of Conflict of Interest

6. A conflict of interest 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 (but not confined to):

6.1 The University is involved in both the EPA and the training delivery of an Apprenticeship Standard.

6.2 An individual may be employed by the University and has links with and/or is also employed in the same organisation as the apprentice.

6.3 When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation.

6.4 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.

6.5 Where an individual working on the EPA has personal interests (paid or unpaid) in the employer organisation undergoing the EPA.

6.6 Where an individual participating has a personal or business gain from the outcome of the assessment.

6.7 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

7. This policy applies to all staff 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, distribution, marking or any other activity connected with tests and assessments, resources or services used within the EPA.
8. Explicitly included in scope for this policy are all employees, contractors, agency or associate staff, verifiers/examiners and other support roles involved in making judgments in relation to the EPA outcome.

Principles

9. As an EPA organisation, the University will:
 - 9.1 Ensure that there is a clear separation between apprenticeship programme delivery and the conduct of EPAs, including ensuring that those involved in EPAs are not also involved in, nor responsible for any on-programme delivery, line-management or on-programme assessment of the same apprentices.
 - 9.2 Ensure that anyone involved in the EPA process is free from any conflicts of interest that could adversely affect their judgement or objectivity in administering and undertaking robust and consistent EPA (in line with the requirements set out in the Assessment Plan for the Apprenticeship Standard).

9.3 Ensure that the recruitment process for those involved in EPA clearly set out the individual's obligation to declare any actual or perceived conflict of interest.

9.4 Ensure that anyone who has access to confidential assessment material associated with EPA (including those contributing to the development, administration and marking of assessments) is independent of the apprentice.

Responsibilities

10. The Academic Registrar is responsible for the Conflict of Interest policy and guidance, and this responsibility includes the annual review of policy and process.

11. The relevant Associate Dean Education & Student Experience (ADESE) is responsible for the briefing and training of staff and for the management and decisions regarding conflicts of interest in relation to EPAs, 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 ADESE to the Academic Registrar.

12. Programme Leads (PLs) are responsible for:

- Early identification of, and planning for, conflict of interest as part of their responsibilities and the planning for every individual EPA.
- 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.
- Ensuring that all individuals (as defined in paragraphs 8 and 9) complete a Declaration of Interest (DoI) Form (Annex A) prior to conducting any EPAs.
- Where needed, implement mitigating actions before the EPA commences escalating the issue to the Academic Registrar for advice and guidance if required.
- Ensuring that relevant staff have access to this policy.

13. All individuals involved in the delivery of EPAs are responsible for:

- Ensuring that they are familiar with this policy and that they proactively declare any actual or perceived conflict of interest using the Declaration of Interest (DoI) Form (Annex A).
- Notifying their PL, at any point, if an actual or perceived conflict of interest arises which is not reflected in their DoI form.
- Raising concerns relating to a conflict of interest directly with the ADESE.

14. The central Apprenticeships team are responsible for:

- Maintaining a register of all individuals involved in EPA, including details of any declared conflicts of interest and mitigating actions if relevant.

Further Advice and Guidance

15. Failure to declare actual or perceived conflicts of interest or to comply with any stipulated plan for managing the disclosed conflict will be considered a serious matter.
16. If an individual has concerns regarding a perceived conflict of interest relating to a third party, this may be raised in confidence with the Academic Registrar. If, once all internal complaints procedures have been exhausted, there continues to be concern, individuals are entitled to disclose information without fear of reprisal in accordance with the University's Whistleblowing Policy.

Owner: Head of UK Partnerships and Apprenticeships

Date approved: 22nd March 2022 (by QLIC)

Next Review date: March 2023

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.

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 relevant Programme Lead.

Apprenticeship Standard	
Employer Organisation(s)	
Apprentice(s)	

No Conflict of Interest Declaration

'NO INTEREST' DECLARATION	I can confirm that, to my knowledge neither I, nor my spouse, partners or other family members have any conflict of interest with the employer organisations or apprentices named above.		
Signed		Date	
Name			

Declaration of Interest

DECLARATION OF INTEREST	I can confirm that mine, my spouse, partners and other family interests in the employer organisation named or apprentices named above are as set out below.		
Signed		Date	
Name			

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To be completed by Programme Lead:

ACTION (please tick)	No Conflict: No action required	
	Conflict: Reassign	
	Conflict: Mitigating Action (see below)	

Details of Mitigation

Signed		Date	
Name			

Please email a copy of the completed form to apprentices@brookes.ac.uk who will retain for audit purposes.