

# CONFLICT OF INTEREST POLICY



# Content

Scope	3
Purpose	3
Responsibilities	3
Overview	4
Definition	4
Acknowledging a conflict of interest	5
Managing conflict	5
Mandatory disclosure and confidentiality	6
Termination for convenience	7
Contacts	7
Glossary	7
Appendix A: Declaration of Conflict of Interest Form Conflict of Interest – Disclosure Form	9

# Scope

This policy covers the delivery of the End-Point Assessment (EPA) for the School Business Professional Apprenticeship ST0575 by the partnership which includes the Institute of School Business Leadership (ISBL) and Serco Education.

The policy is designed to:

- protect apprentices who are registered with us
- minimise the risk of an adverse effect occurring
- help support each member of our partnership involved in risk management and risk minimisation
- help ensure that each member of our partnership complies with all relevant legislation and guidance
- help improve and refine our products and services.

This policy should also be read in conjunction with our EPA Assessment Processes Handbook and the following policies, which are available on our website:

- Malpractice and Maladministration Policy
- Complaints and Appeals Policy
- Reasonable Adjustments and Special Considerations Policy

# Purpose

We are committed to the highest standards of integrity, openness and probity. We are committed to working together in partnership in a transparent and honest working environment that is free from wrongdoing, malpractice or corruption.

The purpose of this policy is to allow our apprentices, employers, training providers, EPA team members and other organisations to feel comfortable and secure in raising relevant disclosures, made in good faith and reasonably believed to be true, without fear of victimisation or other adverse repercussions. In particular, relevant disclosures are likely to be those which may be in conflict with our commitments as outlined above.

# Responsibilities

Our partnership management team must make the apprentices and all team members who are involved in the design, delivery, management, assessment and quality assurance of the EPA aware of, and familiar with, the contents of the policy.

The policy can be downloaded from our website, or copies may be obtained from our EPA Team. We will review this policy annually and may revise it as required in response to the findings of any review.

## Overview

Due to the nature of our business, there are many situations when a conflict of interest may arise. For the purpose of this policy, a conflict of interest is defined as a situation in which an individual, or organisation, has competing interests or loyalties.

This policy applies to all members of the EPA programme team, including admin team members, assessors, invigilators and members of the EPA management team.

This policy is intended to set out the responsibilities of all members of the EPA programme team in managing conflicts of interest in line with their contract/agreement and in supporting us to meet the requirements set out by the ESFA, Charities Commission and in the Ofqual Conditions of Recognition (A4.7).

All existing and reasonably foreseeable conflicts of interest will be identified by our partnership and monitored in line with our standard procedures and escalated to the EPA Programme Manager where appropriate.

These conflicts of interest will be monitored closely, particularly during periods of change, in order to mitigate the possible impact of any potential adverse effect.

Any conflicts of interest that are specific to assessors and invigilators with regard to the apprentices, employers or training providers will be actioned as soon as the EPA team are made aware of them.

## Definition

Conflicts of interest can arise in a variety of circumstances in relation to our business activity, for example:

- when any End-Point Assessor, invigilator or EPA admin team member does not disclose any actual or potential conflict of interest;
- when an individual has a position of authority in the EPA Team that conflicts with his or her interests in another organisation;
- when an individual has personal interests or relationships that conflict with his/her professional position;
- where an individual works for or carries out work on behalf of the EPA Team but who may have personal interests – paid or unpaid – in another business which delivers the SBPA;

- where an individual works for or carries out work on behalf of the EPA Team who has friends or relatives completing the assessment or an employer of an apprentice completing the assessment with our partnership;
- when a member of the EPA Team creates and follows a procedure that conflicts with its regulatory responsibilities as an End-Point Assessment Organisation (EPAO);
- where an individual takes on additional paid work (on either an employed or self-employed basis) or voluntary work outside of the EPA Team that conflicts with the work of the EPA partnership.

Conflicts of interest can also arise where:

- an individual may be employed in one organisation involved in EPA and has links with and/or is employed in the same organisation as the apprentice or an organisation undertaking the programme delivery;
- an individual involved in EPA has a prior link with the apprentice, their employer or an organisation involved in the programme delivery for the standard they are assessing against. For example, they may have friends or relatives involved in delivery;
- an individual involved in EPA may be working for an organisation that is in direct competition with the EPA partnership;
- 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.

## Acknowledging a conflict of interest

If a conflict of interest arises or is anticipated that it might arise, the individual must inform the EPA Programme Manager using the Declaration of Conflict of Interest Form – Appendix A.

We will work with team members to take steps to minimise any risks and resolve the issue. Team members can raise as many Declaration of Conflict of Interest Forms as they need to. This information will be reviewed by the EPA Programme Manager and Admin Team Manager prior to each EPA cohort, ensuring that no member of the team, including assessors and invigilators, assess an apprentice for whom they have declared a conflict of interest.

We will also monitor any conflicts of interest and may on occasion take steps to minimise any conflicts due to the level of the risk or the frequency that the risk occurs.

## Managing conflict

Any conflict of interest should be declared and recorded as soon as the individual becomes aware of them.

Where further action is needed as a result of a declaration, this is documented and managed accordingly; this may include removing the individual from any involvement in a particular assessment or the full assessment of a cohort.

The independence of our decision on the competency of the apprentice is paramount. Any actual or perceived conflict of interest can undermine both the outcome of the end-point assessment and our credibility as a trusted assessor of apprentices.

All EPAs will be delivered in such a way that no organisation or individual who has been involved in the management or training of the apprentice can conduct an assessment method without the independent assessor being present, or make the sole decision on competence and passing the EPA. This means that an end-point assessor or invigilator should not be employed by the same organisation as the apprentice, nor involved in, nor responsible for, any programme delivery, line-management or programme assessment of the same apprentices.

As an organisation required to develop question banks and administer and mark those tests, we have in place clear arrangements to ensure the development, administration and marking of the tests is not subject to conflict of interest and that there is clear separation across these activities.

As of the date of this policy, Serco Education provides SBPA training. No member of the SBPA delivery team will be involved in the end-point assessment. They will be based in separate offices and will not share data or knowledge. The SBPA delivery team and the end-point assessment administration team will report to the Head of Serco Education, but she is not involved in the operational delivery of SBPA and will not be involved in the operational delivery of the end-point assessment administration.

We confirm that all employers of apprentices trained by Serco Education will be given details of each available end-point assessment organisation and that they will not be pressurised or expected to select the partnership as the end-point assessment organisation.

## Mandatory disclosure and confidentiality

It is imperative that the integrity of our assessments is maintained.

Our regulators have outlined some specific conditions that we must meet to protect the integrity across the sector. This includes the requirement that where certain things are identified (such as malpractice), or certain actions taken (such as when sanctions are applied), the Regulators and other relevant EPAOs who may be affected must be informed.

Depending on the seriousness of the matter, we may be required to declare to our regulators that we are no longer compliant due to an act or omission by partners that has put us in breach. In this event, we may have regulatory action directed against us, such as Monetary Penalties. In accordance with the Agreement for Provision of Services Relating to End Point Assessment, we reserve the right to direct such financial penalties against partners, should they be as a result of

the act or omission.

We may need to access confidential information. We will ensure that such information is kept secure and only used for the purposes of the investigation and in line with relevant data protection legislation. We will not normally disclose the information to third parties unless required to do so, e.g. to our regulators and/or the police or other relevant and/or statutory bodies.

## Termination for convenience

Our actions under this policy will be proportionate. Where possible, we will always try to work with the members of our teams including the assessors and invigilators in resolving issues. However, nothing within this policy precludes us from invoking our right under our agreement to terminate our relationship with an assessor/invigilator.

## Contacts

If you have any queries about the contents of the policy, please contact our EPA Team:

E: [epa@isbl.org.uk](mailto:epa@isbl.org.uk)  
 T: 02476 231221

## Glossary

Abbreviation or term	Meaning
Contract	A contract may be a service level agreement (SLA), partnership agreement, contract for goods/services or any other signed agreement in place with our partners.
EPA	End-Point Assessment: An EPA is a collection of assessments that offers confirmation of knowledge, skills and behaviours (known as KSBs) for a particular role. It takes place once the apprenticeship training has been completed and the apprentice is deemed ready to enter the Gateway for EPA. The EPA must be achieved before an apprenticeship certificate can be issued. The structure of an EPA is designed to ensure that those making a decision on the competency of an apprentice are totally unbiased. This means that an assessment must either be conducted by an independent third

Abbreviation or term	Meaning
	party or in a way that ensures no party involved in the management or training of the apprentice can make the sole decision on competence and passing the EPA – i.e. via a panel of experts.
EPAO	End-Point Assessment Organisation: an organisation providing EPA.
Gateway	When an apprentice reaches the end of their training, the employer (supported by the Independent Training Provider) will make the decision on whether or not the apprentice is ready to take the EPA – this decision process or stage is known as the “Gateway”.
ITP	Independent Training Provider: a person who delivers training to an apprentice to enable the apprentice to reach Gateway in conjunction with employers.
IEPA	Independent End-Point Assessor: a person who facilitates an unbiased assessment of an apprentice’s competencies against the KSBs of the standard.
LIEPA	Lead Independent End-Point Assessor: a person responsible for internal quality assurance and standardisation of all assessment practice within EPA and is the sector expert.
Ofqual	Office of Qualifications and Examinations Regulation: a government body regulating examinations, assessments, and qualifications in England and vocational qualifications in Northern Ireland.
Partner	This can be apprentices, employees, employers, external quality assessors, independent training providers and workers.

# Appendix A: Declaration of Conflict of Interest Form Conflict of Interest – Disclosure Form

**Confidential** (When completed)

Name:
Position:
Location:
Organisation (if applicable):

## Conflict of interest or potential conflict of interest

*Describe the conflict of interest or potential conflict of interest that has the potential to impact on your ability to carry out, or be seen to carry out, your allocated role with regard to the End Point Assessment Conflict of Interest Policy.*

*Describe the expected roles/duties you are required to perform.*

**Declaration**

I declare that the above details of my private interests (or my organisation's interests) are correct to the best of my knowledge and am aware of my responsibilities to take reasonable steps to avoid any real or apparent conflict of interest in connection with my employment (or that of my organisation) and to advise the partnership of any relevant changes in my (or our) personal (or professional) circumstances.

Signature:

Date: