

Section 14: Apprenticeship provision

CONFLICT OF INTEREST POLICY FOR APPRENTICESHIP END POINT ASSESSMENT

Background and purpose

1. The University of Reading is an apprenticeship End Point Assessment (EPA) organisation. As such, it is responsible for delivering for each apprentice a high quality, independent, objective assessment of knowledge, skills and behaviours as set out in the relevant assessment plan that accompanies each apprenticeship standard.
2. Providers of End Point Assessment have a critical role to play in ensuring that all apprentices are judged fairly and robustly against the same criteria, thus allowing a decision to be made on whether an apprentice completing their apprenticeship programme has achieved occupational competence.
3. Effective management and mitigation of any perceived or actual conflicts of interest is integral to the ability of an EPA organisation to deliver a robust, fair and high-quality End Point Assessment. Central to this is the need to ensure a clear separation between the delivery of the apprenticeship programme and the End Point Assessment.
4. In accordance with the requirements of the Education and Skills Funding Agency's 'Conditions for Organisations on the Register of End Point Assessment Organisations¹', this policy is designed to outline the measures that the University of Reading (UoR) has in place to effectively manage and mitigate actual or perceived conflicts of interest relating to its own EPA delivery. In doing so, this policy also:
 - a. Defines what is meant by a conflict of interest and how conflicts of interest may arise in the context of the delivery of End Point Assessment.
 - b. Describes the scope of the policy, establishing to whom this policy applies.
 - c. Sets out the accountabilities and responsibilities of individuals and the organisation in managing actual or perceived conflicts of interest.

Definitions

5. A conflict of interest arises when an individual, or the UoR as a whole (including individuals or organisations contracted to deliver EPA on behalf of UoR) has competing interests which could compromise, or appear to compromise, the outcome of an End Point Assessment.
6. Management of conflicts of interest by UoR and by individuals must extend to include perceived and potential, as well as actual conflicts of interest. The perception of a

¹ <https://www.gov.uk/guidance/conditions-for-being-on-the-register-of-end-point-assessment-organisations>

conflict of interest can be damaging to the credibility and integrity of the EPA delivery.

7. Actual, potential or perceived conflicts of interest may include (but not be limited to) the following scenarios, whereby an individual involved in the EPA delivery:
 - a. has a position of authority within one organisation that conflicts with his or her interests in another organisation;
 - b. is involved in the delivery of an apprenticeship programme to the same apprentice or group of apprentices;
 - c. has links to, or works (paid or unpaid) for the same organisation as the apprentice;
 - d. has a prior link to the apprentice or has an extended link to the apprentice's employer (such as via friends or relatives);
 - e. stands to derive personal or business gain from the outcome of the assessment;
 - f. is working for an organisation in direct competition with the apprentice's employer.

Scope

8. This policy applies to those apprenticeship End Point Assessments undertaken where the University is the End Point Assessment Organisation.
9. This policy applies to all staff, consultants, external examiners and partner institutions/organisations taking part in or supporting an End Point Assessment by the University of Reading. This includes UoR employees, contractors, agency or associate staff, including assessment associates, verifiers/examiners and other support roles (this list is not exhaustive).
10. Where the UoR is accountable and responsible for the delivery of EPA, then the University and all those involved in delivering the End Point Assessment must not have conflicts of interest that could affect the objectivity and consistency of the outcome of EPA. In particular, we must ensure that those involved in undertaking the EPA have no involvement in the on-programme delivery, line management or any on-programme progress review of the same apprentice.
11. Every individual involved in UoR's delivery of EPA must complete a Conflict of Interest form (see Annex A) when asked to do so, to identify conflicts of interest and allow mitigation to be planned in response.

Examples of mitigating actions to address actual or perceived conflicts of interest include:

- a. Reorganising the delivery of EPA by assigning another assessor to deliver the EPA. This minimises the risk that an EPA could be adversely affected where a conflict of interest is identified.
- b. If replacing an assessor is not an option, transparent mitigation steps should be taken such as:
 - i. securing appropriate undertakings from the individual(s) concerned to protect the integrity of, and confidence in, the EPA (and the assessor).

- ii. enhanced monitoring of a party's activity within the EPA process
- iii. in extreme cases, organising re-assessment via an alternative EPA organisation.

12. This policy should be read in conjunction with the following policies and documents:

- Public Interest Disclosure (Whistleblowing) Policy - [link](#).
- Complaints Policy for [students](#) and [staff](#)
- Disciplinary Procedure - [link](#).

Responsibilities and accountabilities

13. While this policy applies to all individuals and organisations involved in supporting the delivery of EPA, the University of Reading is ultimately responsible for any conflicts of interest that may arise, regardless of the actor.

14. The Teaching and Learning Dean with responsibility for Henley Business School is accountable for the implementation of this policy, and the Sub-Committee on Delivery and Enhancement of Learning and Teaching (DELT) has responsibility for the annual review and maintenance of the University's conflict of interest policy. The Henley Business School Pro-Dean for Education and Innovation is responsible for ensuring briefing and training of staff in accordance with the requirements of the policy, and for all management and decisions regarding actual or perceived conflicts of interest.

15. An annual review of the delivery of End Point Assessment by the University forms a key part of the University's plan to actively maintain and develop our approach to conflicts of interest as personnel change and our EPA activity and apprenticeship delivery evolves. The annual review should incorporate analysis of any cases of conflict of interest, breaches of the conflict of interest policy, along with a record of the actions taken in response. This will be reviewed annually by the Apprenticeship Board, with onward reporting to the University's Sub-Committee for the Delivery of Teaching and Learning (DELT) (on behalf of the University's Board for Teaching, Learning and the Student Experience (UBTLSE)), providing the oversight required to ensure a robust approach to addressing conflicts of interest is maintained.

16. Furthermore, the University of Reading shall ensure that:

- a. there is a clear separation between the delivery of the apprenticeship programme and delivery of the EPA. In practice this means that individuals involved in the EPA shall have no role in the on-programme delivery, progress reviews or line management of the same apprentices;
- b. advice, guidance and training delivered to apprentices does not compromise the independence of the EPA process;
- c. no-one delivering the EPA has any conflicts of interest that could impair the accuracy and objectivity of any judgement or decisions required in delivering the EPA;
- d. agreements with individuals involved in delivering the EPA are clear on the requirement that any actual or perceived conflict of interest must be declared prior to the EPA starting. This includes conflicts of interest relating to colleagues, friends or relatives;

- e. EPA assessment materials are treated as confidential and kept secure by those involved in the creation, administration and implementation of the EPA process, who must be independent of the apprentice;
 - f. there is no collusion with employers, apprentices, other EPAOs, or those providing the apprenticeship programme, in the delivery of the EPA. This includes offering or accepting any incentives or inducements in relation to the delivery of EPA.
17. In addition to adherence to the terms of this policy, all individuals deployed by UoR in support of the EPA process shall complete and submit a conflict of interest declaration form before beginning work on an EPA. The form will be used to ensure any actual or perceived conflicts of interest are disclosed. Individuals are also expected to notify their Programme Director of any new conflicts of interest as they arise, to be recorded and managed in line with this policy.
 18. Concerns relating to actual or perceived conflicts of interest can be raised with Programme Directors, the Pro-Dean for Education and Innovation, or the Teaching and Learning Dean with responsibility for Henley Business School. Concerns can also be raised anonymously, via the University's Whistleblowing Policy (see above).
 19. Failure to declare an actual or perceived conflict of interest will be considered a matter of misconduct, to be addressed in accordance with the University's Disciplinary Procedure² for staff, and in accordance with the contractual terms of conditions for any individuals participating in EPA delivery who are not employees of the University of Reading.
 20. Responsibility for addressing any disclosed conflicts of interest sits with the Pro-Dean for Education and Innovation. If the issue cannot be resolved at this first stage, it must be passed to the Teaching and Learning Dean with responsibility for Henley Business School for advice and guidance.
 21. Records of action in response to actual or perceived conflicts of interest will be retained six years following termination of appointment, in accordance with our retention guidelines, by the Senior EPA Administrator, and made available for audit purposes on request.

Version Control:

Version	Date Approved	Approved by	Effective from	Next Review	Keeper (responsible for Policy maintenance and review)
1.	02.06.21	DELT on behalf of UBTLSE	1 st July 2021	Summer 2022	DELT
2.	Policy reviewed Autumn 2022 - no changes required			Summer 2023	

² <https://www.reading.ac.uk/human-resources/policies-and-procedures/resolving-problems-at-work/discipline-and-misconduct>

End Point Assessment - Conflict of Interest Declaration Form

This declaration confirms the relationship and interests of individuals involved in the End Point Assessments that the University of Reading undertakes as part of our apprenticeship programme. Every individual involved in the EPA is required to review and declare with respect to the employer organisation (and its apprentice, or group of apprentices) set out below:

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

Guidance

1. This form should be completed in accordance with the Conflict of Interest Policy available at [\[link\]](#).
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 staff member.
3. All documents will be held by the Senior EPA Administrator
4. We may also be required to share personal information with our external regulators and auditors, in accordance with our Staff Privacy Notice - available via [this link](#). In all cases the personal data shared will only be that which is necessary and subject to the University having measures in place to ensure data is handled in line with data protection laws.

EPA Employer Organisation			
‘NO INTEREST’ DECLARATION	I can confirm that neither I, nor my spouse, partners or other family members have any conflict of interest which could compromise, or appear to compromise, delivery of End Point Assessment		
Signed		Date	
Name			

DECLARATION OF INTEREST		I can confirm that my interests and the interests of my spouse, partner and other family are as set out below:	
Signed			Date
Name			
Direct	Indirect	Nature of interest	
SPOUSE, PARTNER OR CLOSE FAMILY MEMBERS (Continue on a separate sheet if necessary)			
Name		Their relationship to you	Nature of Interest

ACTION	No Conflict: No action required		
	Conflict: Reassign		
	Conflict: Mitigating Action (see below)		
Authorised Signature		Date	
Name			
Mitigation			
1			
2			
3			
4			