

CONFLICT OF INTEREST POLICY FOR APPRENTICESHIP END POINT ASSESSMENT

Introduction

1. The University of Suffolk, as an apprenticeship End Point Assessment Organisation, is required to deliver an independent, objective assessment of the knowledge, skills and behaviours set out in the relevant Apprenticeship Standard, 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 End Point Assessment (EPA).
2. 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 EPA.
3. The implementation of this policy is facilitated by the provision of training and/or guidance for all individuals involved in the apprenticeship EPA process, so that they are able to recognise and effectively manage any possible conflicts of interest (be they perceived or actual) that may arise. Individuals involved in EPA are responsible for ensuring that they are familiar with this policy and any associated guidance, and that they participate in any training offered.

Definitions

4. A conflict of interest is defined as a situation in which the University, or an individual employed by the University to participate in the EPA process, has competing interests or loyalties. If not properly managed, the conflict of interest may adversely affect their judgement or influence their objectivity when making decisions.
5. There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. It is therefore important for the University and all individuals involved in EPA to carefully consider how a potential conflict of interest might be perceived by others, and to declare any possible perceived conflict.
6. Examples of actual or perceived conflicts of interest include (but are not confined to) engaging an individual to contribute to the EPA process who:
 - is currently involved in apprenticeship programme delivery and/or on-programme assessment, or has previously been involved in apprenticeship programme delivery and/or

- on-programme assessment unless all students taught or assessed by the individual have completed their programme;
- has a position of authority in one organisation that conflicts with their interests in another organisation;
 - has links with and/or is employed in the same organisation as the apprentice (unless the apprentice is an employee of the University, in which case the individual contributing to the EPA process will have no line management responsibility for the apprentice or involved in current collaborative teaching or research activities with the apprentice);
 - has a prior link with the apprentice, or a link with their employer over the preceding five year period (including having friends or relatives working with the apprentice or involved in programme delivery);
 - has friends, relatives or colleagues taking the apprenticeship programme to which the EPA is aligned;
 - is working for an organisation that is in direct competition with the University;
 - has personal interests, paid or unpaid, in the employer organisation undergoing the EPA;
 - might derive personal or business gain from the outcome of the assessment;
 - has any other interest(s) that may compromise their assessment decisions.

Responsibilities of the University

7. As an End Point Assessment Organisation, the University will:
- ensure that there is a clear separation between apprenticeship programme delivery and the conduct of EPA, including ensuring that those involved in EPA are not also involved in, nor responsible for any on-programme delivery, line-management or on-programme assessment of the same apprentices;
 - ensure that any involvement in the advice, support or training of the apprentice or apprenticeship programmes provided by the University does not conflict with the independence of the EPA process;
 - 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);
 - ensure that the contractual arrangements with those involved in EPA clearly set out the individual's obligation to declare any actual or perceived conflict of interest;

- review processes for the conduct of EPA and the identification and management of actual or perceived conflicts of interest at least annually, under the oversight of the Quality Committee, to ensure a robust approach;
- 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;
- ensure that all members of staff declare any interest for colleagues, friends or relatives undertaking EPA prior to commencement of the EPA process.

Disclosure of actual or perceived conflicts of interest

8. On appointment, and prior to each EPA being undertaken, all individuals employed by the University to contribute to EPA are required to disclose any actual or potential conflicts of interest via submission of a conflict of interest declaration form to the Apprenticeship Hub. Any identified potential or actual conflict of interest must be passed to the Dean, or equivalent, to either resolve the issue or, for issues that cannot be resolved at this level, escalate the issue to the Academic Registrar for advice and guidance. A record of the action taken should be submitted to Apprenticeship Hub. Potential outcomes may include removing the individual from any involvement in EPA.

9. The University's Apprenticeship Hub will maintain a register of all individuals involved in EPA, updated with details of any declared conflicts of interest in order to ensure independence when selecting individuals for the development, administration, delivery and marking of the EPA. All records regarding the identification of potential or actual conflicts of interest and mitigating actions are required to be available for audit purposes, and will be retained in accordance with the Apprenticeship Hub's data retention schedule.

10. 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 and may lead to disciplinary action being taken against the individual(s) concerned, in accordance with the University's Staff Disciplinary Procedure.

Further advice and guidance

11. Guidance on identifying and managing potential conflicts of interest can be sought in the first instance from the Apprenticeship Hub.

12. 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.

13. 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.