

the
ACADEMIC COUNCIL

2 October 2019

TITLE: Apprenticeship End Point Assessment Conflict of Interest Policy
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REPORT FROM: Director, GRE

ISSUE:

In order to act as an assessor for Degree Apprenticeship End Point Assessments (EPAs), the University must be accepted onto a register of approved EPA Organisations (RoEPAO). To gain approval, the University must have policies that set out how it will deliver an independent, objective assessment of the knowledge skills and behaviour defined in the Apprenticeship Standard for every apprentice, including those apprentices it has taught. The “Apprenticeship End Point Assessment Conflict of Interest Policy” enables the University to meet these conditions, and provides the framework for staff to identify, manage and mitigate conflict of interest that may occur as part of an apprenticeship delivered at the University (or by another training provider). The Policy has been approved by the Apprenticeship Strategy Group and is recommended to the Academic Council.

SUMMARY:

The “Apprenticeship End Point Assessment Conflict of Interest Policy” defines where and how conflicts of interest may arise, sets the guiding principles within the University’s regulatory ecosystem, and describes the steps to manage and resolve potential and actual conflicts of interest.

ACTION REQUIRED:

The Academic Council is asked to **approve** the Apprenticeship End Point Assessment Conflict of Interest Policy.

University of Greenwich

Apprenticeship End Point Assessment

Conflict of Interest Policy

Introduction

The University of Greenwich (the University), as and when registered with the Education and Skills Funding Agency to provide end point assessments for specified higher and degree apprenticeships, is required to deliver an independent, objective assessment of the knowledge skills and behaviour set out in an apprenticeship Standard for every apprentice.

This Apprenticeship End Point Assessment Conflict of Interest Policy enables the University to meet these conditions, and provides the framework for staff to identify, manage and mitigate conflict of interest that may occur as part of an apprenticeship delivered at the University or by another training provider.

This Apprenticeship End Point Assessment Conflict of Interest Policy:

- describes the scope of the conflict of interest policy (to whom it applies)
- defines what is meant by conflict of interest
- sets out the principles and responsibilities of the University in the role of end point assessor
- sets out the responsibilities of staff, and others described in the scope, for managing conflict of interest
- identifies who within the University is responsible for monitoring, escalation and further guidance
- is intended to supplement the general provisions relating to Conflict of interest in the University's financial regulations <https://docs.gre.ac.uk/rep/finance/financial-regulations> and is specific to apprenticeships
- provides a conflict of interest declaration form as Schedule 1

All staff, consultants and partners institutions/organisations have a responsibility to:

- protect the independence of the assessment process
- proactively identify their own potential conflict of interest
- comply and support others to comply, with this policy

The University's Greenwich Learning and Teaching will assess every individual directly involved in each end point assessment process and decision on an individual basis, in the context of potential conflict of interest, prior to initiation of the process.

Scope

This Apprenticeship End Point Assessment Conflict of Interest Policy applies to all staff, consultants and partner organisations that interact or potentially interact with the University in its role as an end point assessment organisation.

This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with the University's qualifications, tests and assessments, and supporting resources and services.

Individuals falling within the scope of this policy are all directors, employees, contractors, home workers, agency workers and any associate staff, including assessment associates, verifiers/examiners, freelance staff and others as identified.

Definition of conflict of interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances relating to end point assessment awarding activity including:

- where an organisation has both a training delivery function and the end point assessment function within one umbrella organisation
- when an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation involved in an end point assessment
- when a member of University staff, or an individual performing work on the University's behalf, may have personal, conflicting interests (paid or unpaid) in another business which either uses the University's products or services, or produces similar products relating to the end point assessment
- where an individual who works for the University, or performs assessment work on the University's behalf, has friends or relatives who are apprentices undertaking assessments or examinations at the University
- where an individual participating in the end point assessment has a personal or business gain from the outcome of the end point assessment

Principles

As an end point assessment provider organisation, the University will:

- ensure that when the apprenticeship training delivery arm of the University creates and follows a procedure, the procedure does not conflict with the University's regulatory responsibility as an end point assessment provider organisation
- review the University's processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved
- ensure that the contractual arrangements with our assessment associates clearly set out any obligations on them to manage conflicts of interest arising from other activities which they undertake
- ensure that anyone who has access to confidential assessment material for a qualification is not permitted to deliver training or be present at training sessions on that qualification/apprenticeship
- ensure that all members of staff, partner institutions/organisations and consultants declare any interest for friends or family sitting apprenticeship end point assessments/examinations at the University

Management

The ultimate responsibility for dissemination of, and compliance with, the Apprenticeship End Point Assessment Conflict of Interest Policy and management of potential and actual conflicts of interest resides with the University's Greenwich Institute for Learning and Teaching.

Subsequently, Senior Staff within the University's Faculties and Schools delivering apprenticeships and/or end point assessments are responsible for communicating the Apprenticeship End Point Assessment Conflict of Interest Policy to all individuals within their areas of responsibility annually or more frequently if updated.

Within the University's Faculties and Schools delivering apprenticeships and/or end point assessments:

1. All teams are required to review their relevant procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest
2. Faculty and School Management meetings are required to give appropriate attention to potential or actual conflicts of interest
3. Managers are responsible for ensuring that all new staff receive conflict of interest training
4. Individuals within the University have responsibility for ensuring that they are familiar with the Apprenticeship End Point Assessment Conflict of Interest Policy, any guidelines and complete any required conflict of interest training
5. All individuals will be required annually to read and understand the Apprenticeship End Point Assessment Conflict of Interest Policy
6. Individuals must disclose any activity that may give rise to a potential conflict of interest to their Line Manager
7. Any potential or actual conflict of interest must be documented by Line Managers who must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the University's Greenwich Institute for Learning and Teaching.
8. The individual and Manager are equally responsible for ensuring that the issue is documented carefully
9. All records are required to be available for audit purposes

An individual may wish to raise concerns relating to conflict of interest directly with the University's Greenwich Learning and Teaching. This may be done in confidence and they are entitled to receive a response to their concerns. Individuals are protected under the University's Public Interest Disclosure (Whistleblowing) Policy <https://docs.gre.ac.uk/rep/human-resources/public-interest-whistleblowing-disclosure-policy-and-procedure>

10. Prior to each end point assessment, all staff and other individuals involved in training or assessment must inform the University's Greenwich Institute for Learning and Teaching of any apprentices being entered for its examinations and other assessments, who are family members, other relatives or friends

Monitoring and escalation

The Director of the University's Greenwich Learning and Teaching is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the University and, when necessary, to the University Secretary.

Advice and Guidance

Any required guidance or interpretation on potential conflicts of interest on the delivery of end point assessments should be directed to the University's Greenwich Learning and Teaching.

This Apprenticeship End Point Assessment Conflict of Interest Policy is subject to approval by the University of Greenwich Academic Council

Document Control Box	
Procedure Title:	Apprenticeship End Point Assessment Conflict of Interest Policy
Date Approved:	
Version:	V1
Review Date:	
Document Owner:	Name: Position: Director Unit: University of Greenwich Learning and Teaching
Related regulations, legislation, policies:	Academic Regulations
Related University policies:	
Related Procedures:	
GDPR impact considerations:	

Schedule 1: Declaration of End Point Assessment - Conflict of Interest form

I have read the University of Greenwich's End Point Assessment Conflict of Interest policy approved by Academic Council and understand that as an employee of the University of Greenwich's it is my obligation to act in a manner which promotes the best interests of the University of Greenwich and to avoid conflicts of interest when making decisions and taking actions on behalf of the University of Greenwich.

My answers to this disclosure form are correctly stated to the best of my knowledge and belief. Should a possible conflict of interest arise in my responsibilities to the University of Greenwich, I recognise that I have the obligation to notify, based on my position, the appropriate designated individual and to abstain from any participation in the matter until the University of Greenwich can determine whether a conflict exists and how that conflict shall be resolved. If any relevant changes occur in my affiliations, duties, or financial circumstances, I recognise that I have a continuing obligation to file an amended **Declaration of End Point Assessment - Conflict of Interest form** with the appropriate designated office.

I understand that the information on this form is solely for use by the University of Greenwich and is considered confidential information. Release of this information within the University of Greenwich will be on a need-to-know basis only. Release to external parties will be only when required by law.

Name:

Position:

Faculty/School:

Signature

Date