

UNIVERSITY OF SOUTH WALES
END POINT ASSESSMENT – CONFLICT OF INTEREST POLICY

Conflict of Interest Policy

Introduction

As an apprenticeship end point assessment (EPA) centre, the University Of South Wales (USW) is required to deliver an independent, objective assessment of the knowledge skills and behaviour set out in the apprenticeship Standard, for every apprentice.

This policy enables USW 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. 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 and both comply and support others to comply, with this policy.

Purpose

The purpose of this policy is to protect the interests of the apprentices taking the EPA and also to protect our integrity as a business and the integrity of our qualifications.

This policy will enable USW, as a provider of EPA, to identify, manage and mitigate any conflict of interest, both actual and perceived, when engaging staff and contributors for the development, administration, delivery and marking of the EPA elements.

The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of USW's business as an Education and Training Provider and EPA Centre.

This policy:

- defines what is meant by conflict of interest
- describes the role of conflict of interest in the context of working with, or for, an end point assessment centre
- sets out the responsibilities for managing conflict of interest

Scope of guidance

This policy applies to all staff, consultants and partner organisations that interact or potentially interact with the work of USW's EPA centre. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with USW's qualifications, tests and assessments, and supporting resources and services.

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 the University's Apprenticeship activity; for example;

- where the 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
- when an individual has interests that conflict with his or her professional position where someone works for or carries out work on USW's behalf, but may have personal interests – paid or unpaid – in another business which either uses USW products or services, or produces similar products
- where someone works for or carries out work on USW's behalf, who has friends or relative taking USW assessments or examinations
- where an individual participating has a personal or business gain from the outcome of the assessment
- where an individual is involved in both the delivery function and the EPA elements of the apprenticeship

Principles

As an EPA centre, USW will:

- ensure that USW apprenticeship delivery arm operates in a way that does not conflict with USW's responsibilities as an EPA assessment centre
- review our EPA 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 that they undertake
- ensure that anyone who has access to confidential assessment material for a qualification is not permitted to deliver or be present at teaching activity on that qualification
- ensure that all members of staff declare any interest for friends or family sitting upcoming USW end point assessments

Responsibility

The ultimate responsibility for the conflict of interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Faculty Senior Management Team.

- senior Staff within Schools are responsible for communicating the Conflict of Interest policy to all relevant individuals within their areas of responsibility annually
- all teams are required to review their EPA processes annually to ensure that they anticipate and manage potential or actual conflicts of interest

- management meetings are required to give appropriate attention to potential or actual conflicts of interest
- managers are responsible for ensuring that all new staff involved in the delivery of the EPA receive a copy of the conflict of interest policy
- any potential or actual conflict of interest must be documented within Team Meetings/ 121's. The Manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the Head of School. All records are required to be available for audit purposes.
- Individuals within USW have responsibility for ensuring that they are familiar with the Conflict of Interest policy, any guidelines and complete any required conflict of interest training.
- all individuals involved in the EPA teaching or assessment will be required annually to read and understand the Conflict of Interest Guidance.
- the individual and their line manager are equally responsible for ensuring that the issue is documented carefully.
- an individual may wish to raise concerns relating to conflict of interest directly with the Head of School. This may be done in confidence and they are entitled to receive a response to their concerns. NB individuals are protected under the University's Public Interest disclosure Policy (Whistle Blowing Guidance)
- any staff member involved in the delivery of teaching and or assessment of Apprenticeships, considering paid or unpaid work outside USW should inform their Manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their manager first. The Manager should speak to the Senior management team if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that may be deemed to compete or conflict with USW's activities.
- The Head of School is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the Faculty and, when necessary, to the University Secretary.

Advice and guidance

Any required guidance or interpretation on potential conflicts of interest should be directed to Faculty Contracts Manager

All policies related to USW EPA provision will be publicly available on our website for review by apprentices, employers and all other interested parties

<https://www.southwales.ac.uk/study/degree-apprenticeships/>

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