



UNITED CENTRE  
*of*  
EXCELLENCE

# End Point Assessment Policies

Conflict in Interest Policy  
**GP01**

## Document History

Version	Date	Reason for Revision	Issued by
V1.1	May 2019	Initial release	Alan Bates GP01
V1.2	Nov 2020	Document review during covid-19 (Section 3 updated)	Alan Bates GP01
V1.3	Jul 2021	Review of documentation for Ofqual submission for recognition (Section 3 updated)	Alan Bates GP01
V1.4	March 2022	New Responsibilities section added and the review of managing conflict	Alan Bates GP01
V1.5	January 2024	Policy review, change of address	Alan Bates
V1.6	July 2025	Policy review and update	Alan Bates

Policy Section	Update Made	Ofqual Handbook Reference
<b>Responsibilities</b>	Clarified that all conflicts must be managed in line with Condition A4.7 and escalated appropriately.	<b>A4.1–A4.7</b> – Managing conflicts of interest
<b>Monitoring and Managing Conflict</b>	Strengthened language around independence of assessment and separation of duties.	<b>G1.3, A4.6–A4.7</b> – Assessment integrity and impartiality
<b>Mandatory Disclosure</b>	Emphasised duty to report to regulators and other EPAOs where required.	<b>B3.1–B3.3, A8.5</b> – Reporting to Ofqual and other bodies



<b>IfateAppendix C &amp; D (Examples &amp; Scenarios)</b>	Expanded examples to reflect current regulatory expectations, including dual roles and appeals.	<b>A4.6, I1.2</b> – Avoiding personal interest in assessment and appeals	
<b>Terminology</b>	Replaced all references to <b>IFATE</b> with <b>Skills England</b> .	N/A – Terminology update	
<b>Governance</b>	Reiterated board-level responsibility for oversight of conflicts.	<b>A2.1–A2.3</b> – Governance and accountability	
<b>V1.7</b>	January 2026	Update of Office Address	Amar Dhanjal

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# Conflict in interest policy

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## 1. Overview of the policy

### 1.1 Scope of the policy

This policy covers the delivery of United Centre of Excellence End-Point Assessment's (EPA) that are subject to internal and external quality assurance.

The policy is designed to:

- protect apprentices who are registered with us
- minimise the risk of an Adverse Effect occurring
- help support us and all other partners involved in risk management and risk minimisation
- help ensure we and all partners comply with all relevant legislation and guidance
- help improve and refine our products and services

For our partners, this policy supports the compliance with the Contract. It does not replace any of the requirements contained within that Contract. Non-adherence to our Apprenticeship Services EPA policies may constitute Maladministration, Malpractice and / or a breach of the Contract. Please ensure all policies are read and implemented carefully. This policy should also be read in conjunction with the following policies, which are available on our UCE website and from our Assessment Team:

- Malpractice and Maladministration Policy
- Plagiarism Policy
- Moderation and Verification Policy
- Recruitment Policy and Procedure
- Complaints, Refunds and Appeals Policy

### 1.2 Purpose of the policy

UCE is committed to the highest standards of integrity, openness and probity. We are committed to directly providing, and working with our partners who provide, a transparent and honest working environment that is free from wrongdoing, malpractice or corruption.



The purpose of this policy is to allow our apprentices, staff, partners and other organisations to feel comfortable and secure in raising relevant disclosures, made in good faith and reasonable 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.

### **1.3 Who needs to know about the policy?**

Partners must make the apprentices and staff (including, site, sub-site or contractual staff) who are involved in the design, delivery, management, assessment and quality assurance of UCE EPA aware of, and familiar with, the contents of the policy.

### **1.4 Obtaining copies of the policy**

Partners can download copies of the policy from our UCE website or obtain copies from our UCE Assessment Team.

### **1.5 Reviewing the policy**

We will review this policy annually and may revise it as required in response to the findings of any review.

### **1.6 Complaint**

Partners have the right to express their dissatisfaction regarding our actions, products or services. Our Complaints Policy in particular outlines when we will and will not accept a complaint, and when our decisions are final. Please see our Complaints Policy for more information.

## **2. 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.

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 partners working for or on behalf of UCE, including all colleagues at all locations and at all levels, board members, external contractors, agency workers, partners, any associates, any subsidiaries or their employees or any other person associated with us.

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

All existing and reasonably foreseeable Conflicts of Interest will be identified by our organisation, and monitored in line with our standard procedures and escalated to the Managing or Operational Director 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.

## 4. Types of Conflict of Interest

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

- when any Independent End-Point Assessor (IEPA), partner and/or invigilator we appoint does not disclose any actual or potential conflict of interest;
- when an individual has a position of authority in UCE or the UCE Assessment Team which conflicts with his or her interests in another organisation;
- when an individual has a position of authority in one part of the UCE Assessment Team which conflicts with his or her interests in another part of the UCE;
- 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 UCE Assessment Teams behalf, but who may have personal interests – paid or unpaid – in another business which either uses UCE EPA products or services, or produces similar products to UCE Assessment Team;
- where an individual works for or carries out work on UCE Assessment Teams behalf, who has friends or relatives taking UCE's End Point Assessments, including examinations;
- when one part of UCE Assessment Team creates and follows a procedure that conflicts with its regulatory responsibilities as an Assessment Organisation (AO);
- where an individual takes on additional paid work (on either an employed or self- employed basis) or voluntary work outside UCE Assessment Team which conflicts with the work of UCE.



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 on- programme delivery.
- an individual involved in EPA has a prior link with the apprentice, their employer or an organisation involved in the on-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 organisation involved in on-programme delivery.
- 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.
  - (a) its interests in any activity undertaken by it, on its behalf, or by a member of its Group have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with its Conditions of Recognition (condition A4),
  - (b) a person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisation's Conditions of Recognition, or
  - (c) an informed and reasonable observer would conclude that either of these situations was the case.

#### 4. Acknowledging a conflict of interest

If a conflict of interest arises or partners anticipate that it might arise, they need to let the UCE know using the Declaration of Conflict of Interest Form – Appendix B.

We will work with partners to take steps to minimise any risks and resolve the issue or escalate it to their Head of Organisation if this is not possible. If you are a partner any declarations of Conflicts of Interest should be logged by email using the template provided in Appendix B, to the assessment team under Conflict of Interest, partners can add as many conflicts as they need to.

This information will be reviewed on a quarterly basis by HR who will work with partners to address any areas of particular concern. If there is any doubt whether or not an activity represents a conflict of interest - report it! 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 EPA or referring their assessment decisions to another assessor with no vested interest.



All partners must immediately communicate any issue s/he feels are urgent to an appropriate manager, director or board member as detailed in the Whistle-blowing policy, which may be done in confidence. It should be noted that individuals are protected under the Whistle-blowing policy.

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.

## 5. What should you do if you think someone is acting improperly?

If partners become aware of something they don't feel comfortable with, or they feel someone may be acting in an improper way, please refer to our Whistle-blower policy.

## 6. Monitoring and Managing Conflict

Any conflict of interest should be declared and recorded as soon as the individual becomes aware of them, see examples of conflicts table – Appendix C and the Conflict of Interest Scenarios – Appendix D.

All potential conflicts of interest will be monitored closely, particularly during periods of change, in order to mitigate the possible impact of any potential adverse effect. This will be carried out during the monthly EPA scheduling meeting and quarterly board meeting with the governing board of directors. All records should be recorded and stored securely online via the Monday.com management of COI Board.

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, Qualitrain Limited staff provide training for Qualitrain Apprentices and Blue Lion Training Academy Limited (BLTA) provide BLTA Apprentices Training. No member(s) of both companies' 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 UCE end-point assessment administration team will report to the Operations Directors for UCE, but he is not involved in the operational delivery of any delivery and will not be involved in the operational delivery of the end-point assessment administration.

We confirm that all employers of apprentices trained by Qualitrain and/or BLTA 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.

## 7. Mandatory disclosure and confidentiality

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

Our regulators (EQA) 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.

## 8. 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.

## 9. Contacts

Your contact for this policy

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

Email: [info@UCE.org.uk](mailto:info@UCE.org.uk)

Telephone: 01332 987670

Post: **UCE Assessment Team**  
United Centre *of* Excellence  
Regus Centre, 3 Centro PI, Derby DE24 8RF

## Appendix A: Glossary of Terms

Abbreviation or Term	Meaning
<b>Contract</b>	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.
<b>EPA</b>	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 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 – via a panel of experts, for example.
<b>AO</b>	Assessment Organisation: an organisation providing EPA.
<b>Gateway</b>	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”.
<b>ITP</b>	Independent Training Provider: a person who delivers training to an apprentice to enable the apprentice to reach Gateway in conjunction with employers.
<b>IEPA</b>	Independent End-Point Assessor: a person who facilitates an unbiased assessment of an apprentice’s competencies against the KSBs of the standard.
<b>LIEPA</b>	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.
<b>Ofqual</b>	Office of Qualifications and Examinations Regulation: a government body regulating examinations, assessments, and qualifications in England and vocational qualifications in Northern Ireland.
<b>Stakeholder</b>	This can be apprentices, employees, employers, external quality assessors, independent training providers, employee, workers, assessor, contractor, and an independent end point assessor.



## Appendix B: Declaration of Conflict of Interest form

### Conflict of Interest - Disclosure Form: Assessment-In-Confidence (When completed)

I, ....., As a stakeholder of UCE, have set out below my interests in accordance with the organisation's conflicts of interest policy.

Category	<i>Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected person or some other close personal connection.</i>
Current employment and any previous employment in which you continue to have a financial interest. e.g: full/part time employment or other SLA contracts.	
Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, tribunals etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings (i.e. more than 5% of issued share capital) and beneficial interests.	
Gifts or hospitality valued at £20 or over, offered to you by external bodies in relation to contract at UCE and whether this was declined or accepted in the last 12 months.	



<p>Any other contractual relationship with the company or its subsidiaries i.e. contracts within UCE or its Joint Venture Partners, Qualitain Ltd and/or Blue Lion Training Academy Limited.</p>	
<p>Any other conflicts that are not covered above.</p>	
<p>Any criminal convictions or proceedings in progress.</p>	
<p>Any finding by a court or any professional, regulatory or government body of a breach of provision of any legislation or regulatory obligation.</p>	
<p>Any bankruptcy, arrangement with creditors, or similar financial arrangement which has been applied and from which I have not been discharged.</p>	
<p>Any disqualification from holding a directorship or other public office.</p>	
<p>Any finding of malpractice or maladministration in relation to a qualification (whether regulated or not).</p>	



Position:	
Location:	
Organisation (if applicable)	
Conflict of Interest or potential conflict of interest	
Describe the conflict of interest or potential conflict of interest that have the potential to impact on your ability to carry out, or be seen to carry out, your allocated role or your organisation's role with regards to the United Centre of Excellence 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 UCE of any relevant changes in my (or our) personal (or professional) circumstances.

Signature:

Date:



## Action by Manager

Describe the action proposed to mitigate the real or perceived conflict which has been disclosed and the reasons for the decisions

The above action has been discussed with the employee and is appropriate to resolve the real or apparent conflict of interest disclosed above.

Signature of Manager:

Date:

Employee Endorsement:

Date:

When finalised this form is to be forwarded by email with subject header "Assessment-in-Confidence" to [info@UCE.org.uk](mailto:info@UCE.org.uk)

**You are advised to retain a copy.**





## Appendix C: Examples of Conflict of Interest (COI)

It is not possible to provide a definitive list of examples of conflicts of interest, but the following are examples of situations that could lead to actual or perceived conflicts of interest, that we would expect to be declared by all stakeholders:

- Working with a business outside UCE which performs similar functions to UCE.
- Undertaking assessment, end-point-assessment, approval or quality assurance activities for an organisation of which a contractor is a member of staff, governor, trustee or has some other official status; or with which the contractor has (or has had) involvement as a consultant or adviser.
- Participating in the appointment, promotion, supervision or evaluation of a person who works for a business which performs similar functions to UCE and with whom the contractor has close or familial ties.
- Having a close or familial relationship with someone registered for a UCE qualification and/or assessment; or their family and being involved in decisions about the outcome of the learner/apprentice's qualification and/or assessment.
- Taking part in any UCE decision involving a business that employs a person with whom the contractor, has close or familial relationship.
- Organisations from a consortium in partnership with UCE colluding to assess each other's apprentices and/or to circumvent the requirement for independent assessment

UCE will undertake risk assessment for any declared potential conflicts of interest to ascertain what, if any, further action may be taken.

**The process** for managing potential and actual conflicts of interest is as follows:

- All internal UCE staff working with contractors and stakeholders will be familiar with the content of this policy and attendant mitigation processes.
- All organisations and individuals contracted to undertake activities on behalf of UCE must familiarise themselves with the content of this policy.
- All stakeholders are issued with a conflict of interest declaration form to complete upon commencement of their role with UCE.
- It is a contractual requirement that this is completed. Note – assessors who are contracted by a consortium in partnership with UCE are still required to complete and submit a declaration.
- The information submitted will be evaluated by the relevant UCE management team for whom the contractor is undertaking the activity and where necessary appropriate mitigating



action will be taken.

- Where stakeholder's circumstances relating to conflicts of interest change, they must complete and submit a new declaration form to reflect this. UCE will then review this information and take the appropriate action.
- All conflict of interest declaration forms will be stored electronically by the UCE administrative team on Monday.com and made available for internal and/or external inspection as required.
- Where an individual is contracted for more than one role with UCE, the original declaration form will be sufficient unless the new role(s) presents a different risk of conflict of interest. In these instances a new declaration must be submitted that reflects this.

**The action** for managing potential and actual conflicts of interest is as follows:

Where the information declared on the form(s) requires follow up actions, UCE will manage this process and ensure that the appropriate mitigating action is taken by the particular stakeholder.

These actions and subsequent outcomes will be documented and stored electronically.

Examples of follow-up actions

- Stakeholder(s) are unable to undertake assessment or quality assurance activities with a particular customer.
- Stakeholder(s) will not take part in discussions or decisions of certain matters.
- Stakeholder(s) will refer certain decisions relating to activities to others with no conflict of interest.
- Stakeholder(s) not being involved in a particular project or with a particular customer.
- Stakeholder(s) who have had access to confidential assessment material will not be involved in training events relating to the qualification or assessment.

In all instances where stakeholder(s) are unable to complete an activity that they have been contracted for, UCE will ensure that a suitable replacement is sourced. Where UCE fail to comply with the above processes and agreed actions, UCE will review and, if necessary, in the circumstances (as determined by UCE) issue notice of termination, of their contract with UCE.



## Appendix D: Conflict of Interest Scenarios

<p>1. Departmental resources i.e. staff being asked to support wider UCE work or projects</p>	<p>The Directors of EPA are trained and qualified at Master level and manage risk and project planning and controls on a day-to-day basis. These methodologies and approaches are applied throughout UCE. Risks, issues and conflicts are identified and recorded as part of normal practice. We identify and monitor the scale of EPA work from the outset of a contract and confirm when the requirements need to be met alongside other UCE tasks within our matrix management approach.</p>	<p>By following robust project planning and controls and by utilising associates and external occupationally competent approved subject matter experts, EPA tasks are appropriately managed and covered.</p> <p>UCE will use this opportunity to either Hire short-term associates support through contracting or recruit.</p>
<p>2. A new member staff joins UCE, they are also an apprentice undertaking an apprenticeship. An EPAO has not yet been identified by their training provider or previous employer. The training provider asks UCE to be the EPAO.</p>	<p>Through discussions with the new member of staff (apprentice) during recruitment stages or when the new member of staff decides to tell UCE they are doing an apprenticeship.</p>	<p>UCE will not conduct and carry out EPA services/practices with our own staff. We would consider this to be unethical and a conflict of interest. An alternative EPAO would be sourced.</p>
<p>3. UCE has a member of EPA staff who is undergoing an apprenticeship. UCE has an interest in the apprentice completing their programme timely. The apprentice may be struggling to complete their evidence to the set deadlines provided by the training provider. The apprentice may be tempted to use others work as their evidence.</p>	<p>UCE recognises the continued development of our staff. We take an interest in our apprentices completing their programmes and encourage them to do so. The Directors of EPA get involved with monthly meetings with apprentices and with the training coordinator from the training provider. Work plans are set and agreed with the line manager of the apprentice.</p>	<p>UCE support apprentices following guidance from the training provider. UCE support apprentices with their on/off the job training. Time is provided to apprentices to complete their evidence. This is also discussed during one-to-ones. UCE ensure all work submitted to the training provider and evidence is verified by the line manager.</p>

<p>4. A member of the UCE EPA team, who has access to apprentice records (ie ACE360), is a relative or a close friend to the apprentice who is undertaking their EPA.</p> <p>The apprentice needs to pass three EPA components and explains to their relative that they are struggling with one of their components and asks their relative to ensure they pass that component.</p>	<p>UCE staff (core and associates) are requested to declare any conflicts of interests.</p>	<p>Contractual arrangements are put in place for all staff and third parties who have or have had access to confidential assessment information.</p> <p>Conflicts of Interests must be declared through a number of ways as per our Conflicts of Interest policy.</p> <p>All assessment decisions and judgements are internally quality assured through our IQA's before grades are given. All learner feedback is checked and sampled. If any kind of cheating, malpractice or maladministration is identified the appropriate policy and procedures will be followed.</p>
<p>5. An IEPA is in a relationship with one of our apprentices who is about to go through Gateway and undertake end-point assessment with UCE.</p>	<p>A conflict of interest has been declared as per the Conflict-of-Interest Policy.</p>	<p>UCE will immediately use another assessor (IEPA). If for any reason it is not possible for another IEPA to undertake EPA the Directors will request full scrutiny on all parts of the EPA and full sampling will be conducted on all EPA components to ensure the grades and feedback given can clearly be justified.</p>
<p>6. Viewpoints – an IEPA's or IQA's opinion that could prevent them from operating in an impartial manner</p>	<p>The Directors or project managers seek to identify through standardisation.</p>	<p>All EPA practices, policies procedures and decisions are standardised with all assessors (IEPAs) and IQA's so assessment decisions are valid, consistent, fair and reliable.</p>

<p>7. The training provider puts pressure on the UCE EPAO to put apprentices through their EPA in a much quicker manner due to time constraints /funding, or if the training provider has forgotten to put the apprentice through Gateway</p>	<p>Increased telephones calls and emails coming in from the training provider/employer pushing for quick EPA</p>	<p>UCE use the Learner Management System ACE360. This enables UCE to see apprentices on programme, during their training period and leading up to Gateway. We factor in time to liaise with the training provider to make sure apprentices are on track. This is scheduled on our online platform Monday.com so the IEPA can book the EPA. ESFA now require apprentices to be registered for EPA 6 months prior to Gateway.</p> <p>UCE will ensure fair and reliable assessment is conducted and will work with the employer and training provider if timescales are tight but not to the disadvantage of the learner, or which may disadvantage the learner in any way. As this would be unfair and could possibly lead to an appeal.</p> <p>UCE are educating employers and training providers to register their learners as soon as possible and have given access to ACE360 and Monday.com for them to have full visibility of progress through their apprentices EPA process.</p>
<p>8. The Director(s) needs to conduct EPA activities with Apprentices. Our Director(s) is also a named assessor (IEPA) and IQA on certain standards.</p>	<p>If an IEPA is taken sick the Director may need to step in to ensure learners are not disadvantaged, if another IEPA cannot be found in time.</p>	<p>The Director will only support apprenticeship standards, as an IEPA and IQA where approval has been granted by the IfATE and the EQA.</p> <p>The Director(s) attends standardisation activities, CPD training and must maintain occupational competence to be able to remain as an IEPA or IQA on a standard. The Director(s) follows all the same EPA policies and procedures as the rest of the EPA team. All work completed by the Director(s) must be 100% sampled by the internal quality assurance team.</p>

<p>9. UCE staff (IEPA's/SME's) have produced EPA support and assessment materials (such as EPA mock guides and EPA assessment tools) used in the assessments of EPA. These same people are IEPA's and IQA's.</p>	<p>UCE to acknowledge there would be a potential conflict of interest and record this onto the conflicts of interest log.</p>	<p>Contractual arrangements require staff and third parties who have had access to confidential assessment information are required to notify if they have been, or currently, involved in the preparation of a resource designed to support the preparation of learners for assessment for that qualification.</p> <p>Monitoring assessments set by staff and third parties who have been involved in the preparation of that source. All IEPA's and IQA's go through standardisation and training so assessment judgements are standardised and consistent and recorded on Monday.com</p>
<p>10. UCE has received an allegation of malpractice against one of our IEPA's who has just completed an EPA component with a learner. The IEPA is due to go back into the employer the following month.</p>	<p>Any forms allegations of Malpractice/Maladministration must go through UCE Malpractice/Maladministration policy and procedures. The IQA &amp; Directors will follow the Malpractice / Maladministration process.</p>	<p>Investigation will be conducted by a 'person of appropriate competence' Depending on the nature of the case UCE will need to consider factors such as the nature, scale and scope of alleged or suspected malpractice. Depending on the outcome of the investigation, an alternative assessor may be assigned to the learner. If the investigation found the allegation to be invalid and unjustified the assessor will be asked if they wish to return to the employer. The employer will also be asked if they will accept the assessor returning. If the same assessor was to resume assessment activities at the employer an IQA would conduct 100% sampling on all assessment decisions for that learner to ensure fair and consistent judgement has been given. An IQA may also observe the EPA activities.</p>

<p>11. UCE use a pool of IEPA's and IQAs for our EPA's. Some of our IEPA's and IQAs also act as IEPA's and IQAs for other EPAOs. An IEPA asks to use our materials for the work they are doing with another EPAO or vice versa, they ask to use another EPAOs materials within UCE.</p>	<p>An IEPA makes the request, UCE notice materials are being sent to personal emails addresses or an employer or apprentice contact UCE due to copyright details on materials.</p>	<p>All UCE materials are copyright and must only be used for UCE EPA services. UCE EPA materials must not be shared with any other EPAO or amended in any way for the benefit of another EPAO.</p> <p>Standardisation sessions and training inform and enforce this rule. This works the same for materials from other EPAOs. IEPA's and IQA's are not permitted to bring in materials from other EPAOs.</p>
<p>12. A member of the Board of Governors becomes involved with another EPAO and/or is asked to sit on another Board of Governors</p>	<p>All Governors must declare any conflicts of interest.</p>	<p>All Governors are recruited and appointed onto the UCE Board of Governors; they must declare any conflicts of interest including working with other EPAO's. Any conflicts of interest declared will be reviewed and discussed. If any conflicts of interest are deemed too damaging or too high risk to UCE or unethical the appropriate actions will be taken e.g., a member of the Board of Governors will be asked to step down.</p>



Examples of situations where Conflicts of Interest and personal interests exist or could be perceived to exist: (**Note:** The definition of Centre in these examples is based on future growth of UCE and can also relate to any group of companies)

### Example 1

An UCE is part of a Group, and another company within that Group operates a number of Centres delivering its qualifications.

A Conflict of Interest arises here because the awarding organisation's decisions and actions in relation to its qualifications will also affect that company – for example, by imposing costs or administrative burden.

In turn, consideration of the interests of this related company could impair – or be perceived to impair – the awarding organisation's ability to make objective, unbiased decisions about how best to develop, deliver or award its qualifications.

In particular, the awarding organisation might have – or be perceived to have – an incentive not to uphold qualification standards if that would advance the commercial interests of the other Group company.

### Example 3

Centre staff carry out assessment on behalf of an awarding organisation. The Centre's main source of income is payments based on the number of students who pass the qualification. The pay and reward of Centre staff is directly linked to the Centre's overall income. A Conflict of Interest arises here because an individual Assessor has a financial incentive to ensure that as many students as possible pass the qualification, as this will maximise both the Centre's and their own income.

That incentive could impair – or be perceived to impair – an Assessor's ability to make unbiased judgements about the extent to which a student has demonstrated the required knowledge, skills and understanding. In turn, that makes it less likely that an Assessor will in fact make an objective and unbiased decision. Indeed, in this case Centre staff would most likely have a personal interest in the outcome of assessments for any students at their Centre, and Condition A4.6 for the recognition of Ofqual would require the awarding organisation to take all reasonable steps to avoid using them as Assessors for those students. If this were unavoidable, Condition A4.7 would require any such assessment to be scrutinised by another person.

### Example 4





An awarding organisation has received an allegation of malpractice, and is deciding who should investigate it.

Condition A8.3(b) requires investigators to be 'persons of appropriate competence'. In this case, one individual who meets that requirement is the Head of Centre.

Condition A8.3(b) also requires investigations to be undertaken by 'persons ... who have no personal interest in their outcome'. Whether or not the Head of Centre has such a personal interest here will depend on the facts of the case. It will be a matter of judgement for UCE.

Examples of situations where a Head of Centre has a clear personal interest in the outcome of an investigation would include cases where:

- the Head of Centre is accused of, or potentially implicated in, the alleged malpractice,
- the Head of Centre is related to, or has a close personal relationship with, any of the individuals accused of malpractice, and
- a finding of malpractice would have direct financial consequences for the Head of Centre (for example, if it would place a performance-related bonus, or their job, at risk).

### Example 5

UCE uses a large pool of markers for its assessments. Some of the more experienced markers also act as members of a panel which makes the final decision in respect of the outcome of appeals.

One appeal involves a Learner whose work was originally marked by one of the panel members. A Conflict of Interest arises here in relation to that panel member – because it is their own marking decisions that are being scrutinised on appeal.

That also means the panel member would have a personal interest in the decision being appealed, because the appeal would determine whether or not those marking decisions were appropriate.

As a result, Condition I1.2(b) for the recognition of Ofqual would prohibit that panel member from taking decisions on this appeal. They would, however, be permitted to adjudicate appeals for other Learners whose work they had not marked.

In order to comply with Condition I1.2(c) for the recognition of Ofqual, the appeals panel would also need to include at least one decision maker who was not one of the awarding organisation's markers (and was not connected to the awarding organisation in some other way).

### Example 6





UCE pays individuals who determine appeals.

A Conflict of Interest arises here because the fact that the individual is paid by an awarding organisation creates – or could be perceived to create – an incentive for the individual to make decisions on appeal cases that favour the UCE.

In this instance, a Conflict of Interest is largely unavoidable. It may be unrealistic to expect the awarding organisation to use unpaid volunteers to determine appeals.

The fact that UCE pays the decision maker does not necessarily create a personal interest in the decision being appealed, so it is not prohibited by Condition I1.2(b) for the recognition of Ofqual.

Rather, Condition A4 requires UCE to monitor and manage that Conflict of Interest to prevent it having an Adverse Effect, and to mitigate and correct any Adverse Effect that nonetheless occurs as per this policy document.