

EUIAS Conflicts of Interest Policy

Version 1

September 2023

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Purpose

This policy sets out our approach and processes, as a regulated Awarding Organisation, for identifying, declaring, managing and recording conflicts of interest for anyone involved with the development, delivery or award of our qualifications, including end-point assessments, to maintain the integrity of our business and the validity of our qualifications.

Scope

This policy applies to all individuals working for and on behalf of us, including all colleagues (including the Senior Leadership Team and Board members), agency workers, associates, suppliers, customers, centres and any other person involved in any part of the development, delivery or award of our qualifications, including end-point assessments.

Definition

For the purposes of this policy, a conflict of interest occurs when an individual's personal interest or alternative business interest affects, or might affect or might be perceived to affect, our interest as a regulated Awarding Organisation.

The following quote is taken from Ofqual's General Conditions of Recognition, 'Guidance on Condition A4 – Conflicts of Interest, and is the regulatory requirements against which we manage and mitigate our conflicts of interest. The full guidance on Conflicts of interest A4 can be found at: [Ofqual Handbook: General Conditions of Recognition - Section A - Governance - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/ofqual-handbook-general-conditions-of-recognition-section-a-governance-guidance)

'What is a Conflict of Interest?

...a conflict of interest exists when an organisation or an individual has competing interests, which might impair its or their ability to make objective, unbiased decisions...'

Examples of actual or potential conflicts of interest

The following are examples; not an exhaustive list, of actual or potential conflicts of interest that may exist:

An individual has a family, or other personal or professional relationship to, or has an interest in the result or outcome of an assessment or qualification for a learner who they are allocated to train, invigilate, assess, mark a test, or carry out quality assurance activity.

An individual who writes or reviews or accesses our assessment or qualification materials, and works at an approved Centre which delivers the same assessments or qualifications to learners.

An individual is allocated as end-point assessor, or Internal Quality Assurer (IQA) or External Quality Assurer (EQA) to undertake work for us at an approved Centre or Employer Centre at which they also work or contract or consult with.

An individual who acts in multiple roles at an approved Centre for the same learner or group of learners, for example as Assessor and IQA

An individual works for, or contracts with, or has a vested interest in, another Awarding Organisation which is in direct competition with us or has a similar portfolio.

An individual is involved in an appeal or complaint decision related to a learner with whom they have a family, or other personal or professional relationship or vested interest in the outcome of the appeal or complaint.

Centre responsibilities

Centres are required to operate a conflict of interest policy and process to identify, monitor, manage and record conflicts of interest, which will be sampled as part of quality assurance activities to ensure that an assessment is not undertaken by anyone who has a personal and/or professional interest in the outcome.

Any actual or potential conflicts identified by the Centre or an EQA must be reported to us for review.

We will apply the necessary controls to manage and mitigate potential and actual conflicts of interest where they arise. For example in very specialist or niche areas of work, it may be difficult to separate the training and independent assessment of learners. We would review the circumstances and decide the additional scrutiny

required, which might include an additional independent observer being involved in the assessment activity.

If a conflict is identified by us which has not been raised, this may be subject to an investigation and potentially a sanction.

Conflict of Interest declarations

All individuals working for and on behalf of us, including all colleagues (including the Senior Leadership Team and Board members), agency workers, associates, suppliers, customers, centres and any other person involved in any part of the development, delivery or award of our qualifications, including end-point assessments must familiarise themselves with this policy and complete an annual conflict of interest declaration form and submit each January to: enquiries@euias.co.uk. During the year as new individuals are recruited, Conflicts of Interest declarations must be completed as part of their onboarding.

Should an individual's circumstances change during the year, for example as a result of a job move or taking on further contracting work, this must be notified to us as soon as possible, by completing a newly dated declaration form, which should be sent to us at enquiries@euias.co.uk.

Any queries regarding the completion of the declaration form, should be sent to us at enquiries@euias.co.uk.

Conflicts of Interest Log

We maintain a Conflict of Interests Log which includes:

- the details from the declaration
- the comments, discussions and decision about the declaration, and
- any actions and results of those actions.

Where a conflict or a potential or perceived conflict is declared, it is entered onto the Conflict of Interest Log, and will be considered initially by the Quality Manager and raised at the weekly Management Team meeting for scrutiny. In addition, discussions and agreement may be sought at this point with the Responsible Officer. Based on

discussions and agreement, any mitigating actions will be implemented to ensure such conflicts are managed appropriately for the work that the individual will be undertaking for us, and in line with regulatory requirements.

The Conflicts of Interest Log is reviewed monthly by the Responsible Officer, to ensure we actively and continually reviewing our approach for dealing with conflicts of interest and that any necessary actions are appropriate and completed. Any issues are escalated internally as required, which may include with our Governing Body.

Examples of actions resulting from conflicts of interest declaration reviews

The following are examples; not an exhaustive list, are actions that may result from the discussion and decisions made about an individual's conflict of interest declaration. In the event of a conflict of interest requiring an individual to be removed from a role or activity, we will identify a suitable replacement with the required competence to complete the activity as soon as practicable:

- An individual may not be allocated as end-point assessor, or IQA or EQA to undertake assessments or qualifications for learners with whom they have a family or other personal connection, or for a Centre or Employer Centre at which they also work or contract or consult
- An individual may not be allocated to invigilate, mark a test or an assignment or conduct a profession discussion, quality assure activity for a learner, or Centre or Employer Centre with whom they have a family or other personal or business connection
- An individual may not be able to write or review technical content for an assessment for which they deliver training in another role at an approved Centre for the same assessment or qualification
- An individual must not act in multiple conflicting roles at the same approved Centre for the same learner or group of learners, for example as Assessor and IQA
- An individual may not be contracted to us if their other contracted work or role(s) with another Awarding Organisation would compromise our work in a related industry/ portfolio

- An individual would not be involved in an appeal or complaint decision process related to a learner with whom they have a family, or other personal or professional relationship or vested interest in the outcome of the appeal or complaint.

Policy Review Arrangements

This policy is subject to a three-year review cycle, or earlier should any feedback or concern be brought to our attention, to ensure it remains fit for purpose and the process and its outcomes are deliverable.

Appendix 1 – EUIAS Conflicts of Interest Declaration Form

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Conflict of Interest Declaration

Full Name	
Employer	
Self Employed	
Other	
Job Title	
Role(s) with EUIAS e.g. Standards Assessor / IQA, writer, reviewer or EQA	
Contact phone number	
Contact email address	

Please list any organisations, or people or learners within the energy and utilities industry, and associated Centres or Employers that you are currently or have previously worked with or been connected to, which could be considered an actual or potential conflict of interest with your role at EUIAS.

Organisation	Role / contract/ activity	Dates - from and to
e.g. EnergyEPAO	End-point assessor	Jan 2020 - date

Declaration

I have read and understand the EUIAS Conflicts of Interest Policy and the information I have provided, covers all work activity, contracts and consultancy that I currently undertake in the energy and utilities industry that relates to, or maybe associated with the activity which I will be undertaking for, and on behalf of EUIAS.
(Tick)

Confidentiality
agreement

I shall keep in the strictest confidence all operational and commercial details relating to EUIAS including, but not limited to process, support and assessment materials and content developed. I will not share the material with any organisation or person without seeking permission from EUIAS. Any material that I receive, will be deleted or destroyed once I have completed the work. Tick

Signature

Date

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Please submit this form to: enquiries@euias.co.uk or qualifications@euias.co.uk

For Internal Office QA and Compliance Completion Only	
QA and Compliance Conflicts of Interest Log comments for discussion, agreement and action:	
QA and Compliance Manager signature:	Date signed off/ added to Col Log:

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