



1st for EPA Ltd
End Point Assessment
Conflict of Interest and Whistleblowing Policy

1. Policy purpose

The purpose of this policy is to set out the guidelines and procedures for identifying, monitoring and managing actual, perceived and potential conflicts of interest relating to End Point Assessment (EPA) of Apprentices. This policy applies to all 1st for EPA Ltd employees and contracted staff.

This Conflict of Interest Policy is in place to ensure that all End Point Assessments are undertaken in such a way as to ensure that no party who has been involved in the delivery can make the sole decision on competence, in order to deliver an impartial result.

2. Definition

Whilst it is not possible to provide a definitive list of examples of conflict of interest, the overarching concept is that 1st for EPA Ltd will not engage in any activity that has the potential to lead the organisation to act in a manner contrary to the specific requirements of the ESFA Register of End Point Assessment Organisations. Some examples of actual, potential or perceived conflicts of interest could arise if:

- 1st for EPA Ltd or its staff became involved in both the EPA and the on-programme delivery of a standard.
- Staff or contractors employed by 1st for EPA Ltd had links with and/or were employed by the same organisation as the apprentice or the organisation undertaking the on-programme delivery. A link could be established by a number of factors for example, family members studying at or employed by the main provider, employer provider or sub-contracted provider or a transactional link (in money or reciprocal in kind).
- Staff or contractors employed by 1st for EPA Ltd to undertake EPA had a prior link with an apprentice, their employer or an organisation involved in the on-programme delivery (for example, they may have friends or relatives involved in the delivery).
- Staff or contractors employed by 1st for EPA Ltd to undertake EPA were also working for an organisation that is in direct competition with the organisation involved in on-programme delivery.

3. Scope

This policy applies to all key stakeholders engaged with the End Point Assessment activities on behalf of 1st for EPA Ltd and any person who can influence the outcomes of End Point Assessment. This includes Employers, Contractors and 1st for EPA Ltd employees.

4. Recognising conflicts

On appointment, all 1st for EPA Ltd employees and contractors are required to declare any known conflicts of interest. 1st for EPA Ltd acknowledges that it is not always possible to pre-empt when a conflict of interest is likely to arise so mechanisms for identifying and reporting actual, perceived and potential conflicts of interest before, during and after End Point Assessment activities are also covered by this policy.

An actual, perceived or potential conflict of interest may be declared by any key stakeholder as an entity, or any individual, and at any point in the End Point Assessment process. Declarations of known conflict made by a third party will come under the auspices of the Public Interest Disclosure Act 1998. It should be noted however that to be protected by the



law, a whistle-blower must fall within the stringent legal rules. Anyone who does not act in good faith or is motivated by personal gain will not be protected.

5. Interests in End Point Assessment

1st for EPA Ltd acknowledges that there is a requirement to avoid, eliminate or minimise any conflicts of interest.

1st for EPA Ltd will, therefore, take all reasonable steps to avoid any part of the End Point Assessment of an Apprentice being undertaken by any person who has a vested interest in the result of the End Point Assessment.

Where, having taken all reasonable steps, an assessment by such a person cannot be avoided, 1st for EPA Ltd will make arrangements for the relevant part of the End Point Assessment to be subject to scrutiny by another person.

It is felt that by adhering to the principles of neutrality, openness and fairness, conflicts can be avoided or managed without compromising the integrity of the individual, the End Point Assessment process or 1st for EPA Ltd Awarding Body.

6. Managing Conflicts

In most cases, it is envisaged that simple measures will be enough to manage conflicts of interest. It may be that the activity can be managed differently so that conflicts of interest are avoided.

In other cases, a simple undertaking by an individual to prioritise the interests of 1st for EPA Ltd will be all that is required. Only in extreme circumstances where the conflict of interest may be so fundamental and unmanageable, will an individual be prevented from undertaking specific activities.

For example, where an assessor declares a conflict with a training provider, we will ensure that assessor does not assess apprentices who have been taught by that training provider.

7. Responsibilities

The End Point Assessment Organisation Conditions of Acceptance state:

“The independence of your 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 activity and your credibility as a trusted assessor of apprentices.”

It is the responsibility of all persons, when involved in the End Point Assessment of Apprentices and other associated activities to:

- conduct their activities so that 1st for EPA Ltd maintains a high standard of quality assurance;
- ensure that they make their role clear – and separate this from their other functions, in so far as is possible;
- monitor their activities, so as to maintain the integrity of 1st for EPA Ltd;
- devote enough time and intellectual ability to their specific responsibilities;
- recognise and report any potential or existing conflict promptly whether that be related to themselves, or others.

Where an individual knows of a conflict and does not declare it, this may amount to malpractice, in which case the Malpractice and Maladministration Policy will be followed.

8. Recording Procedure



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End Point Assessment made easy

All stakeholders are required to read and comply with the 1st for EPA Ltd Conflict of Interest Policy.

Any conflicts that arise will be noted on a Conflict of Interest Register, along with the actions taken.

This register will be checked before any individual is asked to undertake End Point Assessment activities on behalf of 1st for EPA Ltd, and will be available for review by our external quality assurers (EQA).

9. Policy Review

This policy was last updated 4 November 2020. It will be monitored and reviewed at regular intervals and as legislation requires.