



End Point Assessment Conflict of Interest Policy - Apprenticeships

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Related policies:	Staff and Student Relationship Policy Anti-Bribery and Fraud policy Conflict of Interest Policy Whistleblowing Policy
Related procedures:	Staff and Student Relationship Procedure Conflict of Interest procedure

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Version History

Version	Approved by	Revisions made	Date
V2	CP	Yes	August 2025

1. Purpose

- 1.1 Concerning providing Apprenticeship End-Point Assessment the University of Buckingham is required to deliver an independent, objective assessment of the knowledge skills and behaviour set out in the apprenticeship Standard, for every apprentice.
- 1.2 This policy enables the University to meet those conditions and provides the framework for staff to identify, manage and mitigate conflict of interest that may occur as part of an Apprenticeship Standard. All staff, consultants and partner 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.
- 1.3 The University of Buckingham recognises the importance of external confirmation of the standards and quality of its awards. The University continues to meet its obligations and expectations as set out by the Office for Students (OfS) and the Quality Standard Review (QSR) and participates in OfS monitoring and reporting accordingly.
- 1.4 The University of Buckingham has developed this conflict-of-interest policy, for Higher Level and Degree Apprenticeship provisions it may deliver directly, deliver via supporting provider arrangements, or for which it validates any element of a Standard, through franchise or other such arrangements.

2. Scope

- 2.1 This policy applies to staff and contractors when delivering the end-point assessment for integrated degree apprenticeships.
- 2.2 This applies to all scenarios including where the University delivers or validates Higher Degree Level Apprenticeships with integrated End-Point Assessment.

3. Legislative context

- 3.1 Compliance with current requirements of the Department for Education (DfE), OfS and Skills England.

4. Policy statement

- 4.1 This EPA policy forms one of a suite of policies which are designed to:
 - protect apprentices who are registered with the University.
 - minimise the risk of an inappropriate EPA process and outcome occurring;
 - eliminate appeals situations and enhance the credibility of Apprenticeship outcome and achievement validation.
 - help support the University, and its partners involved in risk management and risk minimisation.
 - help ensure the University, and all its partners comply with all relevant legislation and guidance; and
 - help improve and refine the University's provision and collaborative activity.



- 4.2 This is intended to ensure the integrity of Apprenticeship delivery and the achievement of the associated Apprenticeship award and any component qualifications.
- 4.3 This includes ensuring that there is a clear separation between apprenticeship programme delivery and the undertaking of and conduct of the End Point Assessment process
- 4.4 This policy is designed to enable the University to identify, manage and mitigate any conflicts of interest, both perceived and actual when engaging individuals in apprenticeship programme delivery and in the development, administration, delivery and marking of EPA
- 4.5 For our partners, this policy supports compliance with contracts. It does not replace any of the requirements contained within a contract. Non-adherence to the University's EPA policies may constitute maladministration, malpractice and/or a breach of a contract.

5. Responsibility

5.1 As an End Point Assessment Organisation, the University will:

- Ensure that there is a clear separation between apprenticeship programme delivery and the conduct of EPA, including ensuring that those involved in EPA are not also involved in, nor responsible for any on-programme delivery, line-management or on-programme assessment of the same apprentices.
- Ensure that any involvement in the advice, support or training of the apprentice or apprenticeship programmes provided by the University does not conflict with the independence of the EPA process;
- Ensure that anyone involved in the EPA process is free from any conflicts of interest that could adversely affect their judgement or objectivity in administering and undertaking robust and consistent EPA (in line with the requirements set out in the Assessment Plan for the Apprenticeship Standard);
- Ensure that the contractual arrangements with those involved in EPA is clearly set out the individual's obligation to declare any actual or perceived conflict of interest;
- Review processes for the conduct of EPA and the identification and management of actual or perceived conflicts of interest at least annually, under the oversight of the relevant Quality and Standards Committee.
- Ensure that anyone who has access to confidential assessment material associated with EPA (including those contributing to the development, administration and marking of assessments) is independent of the apprentice.

- Ensure that all members of staff declare any interest for colleagues, friends or relatives undertaking EPA before the commencement of the EPA process

5.2 DISCLOSURE OF ACTUAL OR PERCEIVED CONFLICTS OF INTEREST

5.3 On appointment, and on at least an annual basis thereafter (normally at the start of each academic year), all individuals employed by the University to contribute to EPA are contractually obliged to disclose any actual or potential conflicts of interest via submission of a conflict of interest declaration form to the Director of Academic Services.

5.4 Any identified potential or actual conflict of interest must be passed to the Faculty Dean to either resolve the issue or, for issues that cannot be resolved at this level, escalate the issue to the Registrar & Chief Administrative Officer for advice and guidance. A record of the action taken should be submitted to the Registrar & Chief Administrative Officer. Potential outcomes may include removing the individual from any involvement in EPA.

5.5 The University will maintain a register of all individuals involved in EPA, updated with details of any declared conflicts of interest in order to ensure independence when selecting individuals for the development, administration, delivery and marking of the EPA. All records regarding the identification of potential or actual conflicts of interest and mitigating actions are required to be available for audit purposes and will be retained in accordance with the University's data retention schedule.

5.6 Failure to declare actual or perceived conflicts of interest or to comply with any stipulated plan for managing the disclosed conflict will be considered a serious matter and may lead to disciplinary action being taken against the individual(s) concerned, in accordance with the University's Staff Disciplinary Procedure.

6. Relationship with other policies/procedures

6.1 This policy should be read in conjunction with the University's relevant Quality Handbooks and other guidance and policy materials linked to its provision of Apprenticeship Standards.

The University's Handbooks outline its frameworks, policies, procedures and guidance for the setting and maintenance of academic standards and the quality and enhancement of student's learning opportunities. They provide key information, procedures, regulations, templates and forms for prospective and current students, and members of staff.

7. Definitions

7.1 A conflict of interest is defined as a situation in which the University, or an individual employed by the University to participate in the EPA process, has competing interests or loyalties. If not properly managed, the conflict of interest may adversely affect their judgement or influence their objectivity when making decisions.



7.2 There can be situations in which the appearance of a conflict of interest is present even when no conflict exists. It is therefore important for the University and all individuals involved in EPA to carefully consider how a potential conflict of interest might be perceived by others, and to declare any possible perceived conflicts.

7.3 Examples of actual or perceived conflicts of interest include (but are not confined to) engaging an individual to contribute to the EPA process who:

- Is currently involved in apprenticeship programme delivery and/or on-programme assessment, or has previously been involved in apprenticeship programme delivery and/or on-programme assessment unless all students taught or assessed by the individual have completed their programme;
- Has links with and/or is employed in the same organisation as the apprentice (unless the apprentice is an employee of the University, in which case the individual contributing to the
- EPA process will have no line management responsibility for the apprentice.
- Has a prior link with the apprentice or a link with their employer over the preceding five-year period (including having friends or relatives involved in programme delivery);
- Has friends, relatives or colleagues taking the apprenticeship programme to which the EPA is aligned;
- Is working for an organisation that is in direct competition with the University;
- Might derive personal or business gain from the outcome of the assessment;
- Has any other interest(s) that may compromise their assessment decisions

8. Referral

8.1 Guidance on identifying and managing potential conflicts of interest can be sought in the first instance from the Registrar & Chief Administrative Officer.

8.2 If an individual has concerns regarding a perceived conflict of interest relating to a third party, this may be raised in confidence with the Registrar & Chief Administrative Officer.

8.3 If, once all internal complaints procedures have been exhausted, there continues to be concern, individuals are entitled to disclose information without fear of reprisal in accordance with the University's Whistleblowing Policy.