

# EPAO Conflict of Interest and Personal Interests Policy

## Table of Contents

Purpose.....	3
Scope.....	3
Definitions .....	3
Organisation Requirements.....	4
Declaration of Interest Process .....	5
Action .....	5
Policy version and owner.....	5
Regulatory references .....	5
Appendix 1 – Separation structure .....	7
EPAO Management Structure.....	7
Apprenticeship Training Provider Management Structure .....	7

## Purpose

CIPFA remains the world's only professional body dedicated to public finance and accountancy. Our purpose is as focused and unique as the members we represent.

At CIPFA, we have been at the heart of the development of the new Apprenticeship Programme and are uniquely placed to support employers as they plan to maximise the opportunities of the Apprenticeship Levy – both in our capacity as a professional qualifying body and as a respected training provider, through CIPFA's Education and Training Centre.

We have been accepted onto the Register of Apprenticeship Training Providers and are also applying to be accepted onto the Register of End-point Assessment Organisations for Apprenticeship Standards within accounting.

Our acceptance on both of these registers means that CIPFA needs to have in place a robust yet workable Conflicts of Interest Policy to enable and ensure strict demarcation between our Apprenticeship Training Provider (ATP) and End-point Assessment Organisation (EPAO) operations.

This will ensure that:

- The validity and integrity of Apprenticeship end-point assessments is assured
- The progress of individual Apprentices is not compromised or improperly influenced or affected in any way

We as the organisation are accountable and responsible for the EPA, and the individual End-Point Associates we deploy must be free from any conflicts of interest that could adversely affect our judgement or objectivity in undertaking robust and consistent EPAs.

## Scope

This policy outlines the principles and procedures for managing conflicts of interest within CIPFA in relation to its responsibilities to ensuring complete independence as an EPAO.

It details how we will ensure that Apprentices are not adversely affected and that Apprenticeships are not awarded inappropriately or withheld as a result of conflicts of interest.

In addition, we protect our staff and associates by providing training and guidance on recognising and subsequently dealing with possible conflicts of interest.

This document is aimed at internal CIPFA staff, our members and external stakeholders which includes Council, Committee, Subject Matter Experts (SMEs), End-point Associates and any other persons involved in any steps of the assessment process.

## Definitions

A conflict of interest may generally be defined as:

A **conflict** - actual or perceived, that undermines or comes between the responsibility of End-point Assessment staff and/or associates to make fair, reliable, consistent and rigorous assessment decisions of Apprentices.'

**Personal interests** - might include either personal or professional and internally or externally to CIPFA. This includes where a relationship between CIPFA and other Training Providers, employers or third parties may potentially compromise the impartiality of the assessment.

## Roles within the assessment system

This consists of Subject Matter Experts (SMEs) who are:

- Assessment Authors
- Moderators (Paper Production)
- Markers, also known as Independent End Point Assessor (IEPA)
- Lead Marker, also known as Lead Independent End Point Assessor (LIEPA)
- Moderator (Marking) also known as Internal Quality Assurer (IQA)
- Examination Panel members

## Organisation Requirements

It is the overall responsibility of CIPFA's Head of Qualifications and Membership to ensure that all centre activities comply with the requirements, as well as the spirit, of this policy and meets all external quality assurance requirements of the Institute of Apprenticeships.

Practices we have in place include:

- A separate management structure for each of the ATP and EPAO functions (Appendix 1)
- Separate accounting, record keeping and operational processes to accommodate the two distinct roles.
- A strict policy that under no circumstance will CIPFA's employees or associates provide both Apprenticeship Training and End-point Assessment for the same Apprentice.

It is the policy of CIPFA that every Associate/Subject Matter Expert acting on behalf of the EPAO must be free from all conflicts of interest that could adversely affect their judgement or objectivity towards assessment decisions and their outcomes.

All individual CIPFA End-point Associates will be required to certify their independence from an Apprentice, their Employer and the ATP before undertaking any assessment work with that Apprentice. (Appendix 2).

CIPFA End-point Associates will only be deployed to assess this Standard where there is no direct contact with associated employers or training providers.

Prior to marking assessment scripts will be anonymised for marking purposes using student numbers and will be free from any references to the identity of the apprentices.

It is also the responsibility of each End-point Associates to recognise situations in which they have a conflict of interest or might reasonably be seen by others to have a conflict.

They should then disclose this potential conflict immediately and prior to assessing (Appendix 3).

Where it is identified that any individual is in breach of any of the above requirements, they will be immediately suspended from all CIPFA assessment activity.

An investigation will be conducted following the Disciplinary and Grievance Procedure.

## Declaration of Interest Process

It is the duty of all employed staff and associates to disclose any actual or potential conflict of interest, and the process for doing this is documented below:

- All staff and associates are required to complete a Conflict of Interest Declaration Form on commencement with the organisation and it is a requirement of their contract that this is completed and updated on an annual basis.
- The information held on the Conflict of Interest Declaration Form is then stored and maintained by the Assessment and Compliance Manager.
- If the individual concerned has any changes to their declared circumstances at any point, they must inform the Assessment and Compliance Manager immediately in by email, so that the conflict of interest can be evaluated, and the register updated. Emails should be sent to 'qualitycompliance@cipfa.org'.
- The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept.

## Action

Most situations require no further action other than the completion of the Conflict of Interest Declaration form and updating of the register. In some instances, however, the information declared on the form will require some follow up, in order for the conflict of interest to be managed appropriately.

The approach agreed between the Assessment and Compliance Manager and End-point Associate will be documented and held with the conflict of interest forms and declarations.

## Policy version and owner

Policy owner	Head of Qualifications and Membership
Version	2.0
Update	September 2022
Approval	SMB 05 September 2022
Policy review date	September 2023

## Regulatory references

Conflicts of interest and occurrences of personal interest have the potential to affect any stages of the delivery and assessment of EPA and subsequently regulatory Conditions, but the main ones are listed below.

Ofqual General Conditions of Recognition

Condition A4: Conflicts of Interest

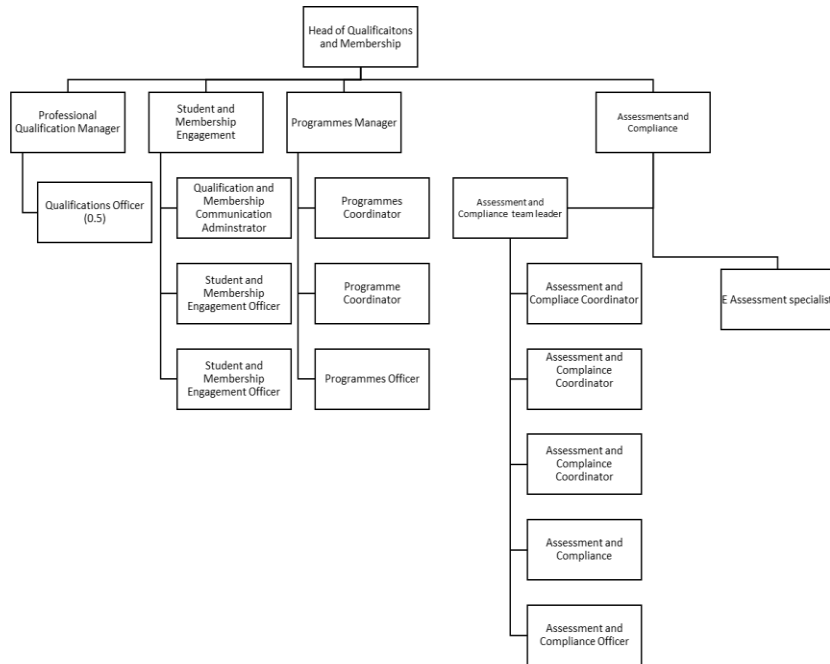
Condition A8.3 (b): Malpractice and Maladministration (personal interest)

Condition G4: Maintaining Confidentiality of Assessment Materials

Condition I1.2 (b): Appeals (personal interest)

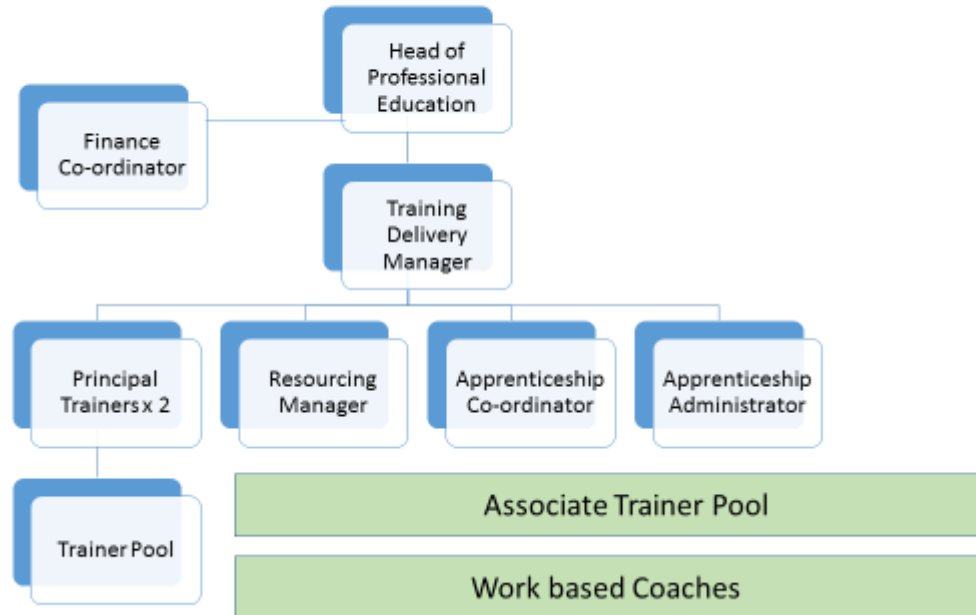
## Appendix 1 – Separation structure

### EPAO Management Structure



### Apprenticeship Training Provider Management Structure

**CIPFA Education and Training Centre**



Please refer to separate attachment, Appendix 2 – Conflict of Interest Form. This covers the Annual Declaration and One-off Disclosure Report.