



**assessments**

**Conflicts  
of  
Interest Policy**

# Conflicts of Interest Policy

## Introduction

A conflict of interest occurs when an individual or organisation has an interest which may compromise their independence of judgment or impartiality and diligence in decision making. It is vital that In2Assessments activity at every level is seen to be independent and impartial and that any Conflicts of Interest, whether perceived or actual are identified and (where appropriate) mitigated.

## Scope

This policy covers all individuals involved with In2Assessments and this includes:

- Contacted EPA Assessors
- Contracted Internal quality assurers
- Contracted assessment authors
- In2Assessments operational staff
- Governance Committee Members
- In2Assessments Directors (Governing Body)
- Shared services arrangements between In2Assessments and IL In2Assessments are committed to ensuring assessment decisions relating to End-Point Assessment of the apprentice should not be the responsibility of any individual who has an interest in the result.

In addition, anyone who has been involved in training the apprentice will not be involved in end point assessment.

## Purpose of Policy

In2Assessments recognises that employees and others, e.g. contractors, involved with In2Assessments may have other financial, business, charitable and other interests and activities outside In2Assessments.

This policy has therefore been put in place to demonstrate how In2Assessments ensure no conflicts of interest impact all decision making, including the assessment of EPA.

To ensure this happens, In2Assessments follow the following principles:

- **Identify and disclose** – through the conflict-of-interest declaration, ensuring staff awareness and scenario planning.
- **Remove or prohibit the conflict** – where there is conflict our first option will always be to remove the conflict. For example: is an assessor had previously been connected to a Training provider where In2Assessments where the EPAO we would not use them to assess the Training Providers Apprentices.
- **Agree to mitigate and manage the conflict of interest** – for each potential or actual conflict of interest In2Assessments will ensure these are managed and mitigated.

Properly managed, individuals with declared personal interests should be able to conduct their business without restriction; however, conflicts which are not properly

managed could bring into question the reputation and validity of In2Assessments end-point assessments. It is In2Assessments policy to ensure all potential conflicts are disclosed and investigated before any work is carried out by the individual in question.

## **How individuals are made aware of the policy and how to declare**

Individuals working with In2Assessments, for example within the roles above, will receive an induction on Conflicts of Interest and will receive a copy of the policy and will be required to complete a conflict-of-interest form.

Although it is impossible to predict every possible perceived or actual conflict of interest, In2Assessments conduct periodic reviews of conflicts that could occur and determine their mitigation, these are included in the tables at the end of the policy.

In addition, the conflict-of-interest declaration form includes some key questions that can help them consider conflicts of interest.

## **In2Assessments expectations of individuals**

In2Assessments expects all individuals involved with them as an employee, committee member or director to be fully transparent with regard to any other interests that may be a perceived or real conflict of interest.

Any individual failing to do so, or abide by this policy, may be subject to disciplinary action or cancelation of their contract.

## **Identifying Areas of Conflict**

In2Assessments acknowledges that it is not always possible to pre-empt when a conflict of interest could arise, and this policy is not designed to cover every eventuality. Generally, there will be a conflict of interest if an individual's interest and/or loyalties conflict with In2Assessments developing, delivering and awarding EPAs.

Conflicts of interest will be identified by In2Assessments on an ongoing basis by the the Head of Assessment. The Conflict of Interest Register is subject to on-going review and is subject to scrutiny by the Governance Committee.

Generally, the main areas where conflict might occur are identified as follows:

- **Third Parties** - Potential conflicts with external contracted third parties such as Assessors or assessment authors.
- **Relationships between In2Assessments and companies in the Inspiring Learning Group** - these include a number of training providers.
- **Governance, Management and Staff** - Potential conflicts with In2Assessments Directors, employees and/or **In2Assessments** Governance Committee members.

These conflicts can also arise through the interests, work or relationships of household members, friends/family and close associates. Conflicts relating to another individual should also be disclosed.

## **Minimising and Preventing Conflicts**

In2Assessments strives to ensure it minimises and prevents conflicts where possible by:

- avoiding arrangements that may reduce competition or create exclusive arrangements
- avoiding practices that could be construed as anti-competitive or restrictive practice
- avoiding conflicts of interests in assessment to ensure that assessors are not carrying out assessments in which they have a personal interest
- providing the In2Assessments stakeholders with objective advice on the viability of qualifications development and availability of qualifications for the needs of the sector
- enabling open and frank dialogue between teams within In2Assessments
- avoiding any conflict of interest that may lead to an adverse effect (as defined by Ofqual), and to mitigate the impact of any adverse effect, should one occur.

Although this list is not exhaustive, 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 or the organisation concerned.

## **How In2Assessments Manage and Monitor Conflicts of Interest**

In2Assessments maintains a Conflict-of-Interest Register managed and maintained by the Head of Assessments and is reviewed at each quarterly meeting of the Governance Committee.

Quarterly reports are submitted to the Governance Committee of potential conflicts of interest for discussion and action (any potential conflicts identified between meetings would be subject either to an Extraordinary Governance Board Meeting, or decision by the Chair depending on the severity or nature of the conflict require it).

Checks with Governance Board members, Directors, employees or Assessors that any changes to roles and responsibilities do not indicate a potential conflict.

Number	Area of potential conflict of Interest – and who / what does it relate to	What is the potential conflict of interest.	How is the potential conflict interest mitigated or removed	Who is responsible for monitoring the COI	Comments
R1	<p><b>Relationships between In2Assessments and companies in the Inspiring Learning Group</b> - Skern Training &amp; Skills are part of the Inspiring Learning Group and are an approved RoATP organisation currently offering a range of apprenticeship standards across various sectors (this include Level 3 Outdoor Activity Instructor ST0479 And Level 5 Outdoor Learning Specialist ST0945)</p> <p>In addition, Kingswood (another company within the IL group) have apprentices who are trained by Skern Training and Skills</p>	<p>Skern Training &amp; Skills are part of the Inspiring Learning Group and have the same two directors (Governing Body) as In2assessments, this, if unmitigated is a potential COI as theoretically the two directors could have influence on the outcome of Skern Training &amp; Skills assessed for EPA by In2assessments.</p>	<p>Skern Training and Skills and In2Assessmment are run as separate business within the Inspiring Learning Group.</p> <p>In addition, the two directors have no influence on the outcome of assessment decisions within In2Assessmment due to a delegation scheme with the Governance Committee</p>	<p>The chair of the Governing Committee is responsible for monitoring the management of this COI.</p>	
R2	<p><b>Relationships between In2Assessments and companies in the Inspiring Learning Group</b> – Use and access to IT systems and information within In2Assessmment</p>	<p>As companies within the Inspiring Learning Group have a shared IT system, there is a potential conflict if data from In2Assessments was accessible across the Inspiring learning group.</p>	<p>Data will be managed in line with the IT Policy. Access to files across the organisation are restricted to named and secure login. Ensuring that only those with appropriate access among the Therefore only In2assessments staff will be able to retrieve and edit data relating the EPAO</p> <p>In2assessments electronic files are stored and accessed from a separate drive from the rest of the group. This drive has restricted access, currently limited to Barry Kaufman-Hill and Ellie Websdell.</p> <p>The intention is to sign up to a third party provider to register, track and manage the EPA process. This will be on secure third party servers and with individual personal login.</p>	<p>Head of In2assessments With support of the IL IT team.</p>	

Number	Area of potential conflict of Interest – and who / what does it relate to	What is the potential conflict of interest.	How is the potential conflict interest mitigated or removed	Who is responsible for monitoring the COI	Comments
R3	<b>Relationships between In2Assessments and companies in the Inspiring Learning Group – additional support and training or prioritisation</b>	IL group members given more support than external customers or preferential treatment	Contracts will be drawn up for all customers outlining the level of provision and commitment provided by In2assessments, including timescales and levels of service. These will set clear frameworks of working for both parties and will clearly show how In2assessments will meet its obligations.	Head of assessments  Governing Committee will review this at each quarterly meeting.	
R4	<b>Relationships between In2Assessments and companies in the Inspiring Learning Group – additional discount given to IL group members, or payment incentives for ‘passed’ learners.</b>	IL are seen to be given a preferential price for EPA or a pricing structure that could influence the assessment outcome e.g. a high rate is paid if apprentices pass first time.	In2 assessments will have a pricing structure that will apply to all customers whether or not they are members of the IL group.  This will be set out within the contract signed by In2assessments and STS and other external training providers.	Head of assessments  Overseen by the Governing Committee	
R5	<b>Relationships between In2Assessments and companies in the Inspiring Learning Group – Prioritisation of Inspiring Learning Group apprentice over those not from the Inspiring Learning Group</b>	Access to EPA may be prioritised, or appear to be prioritised for IL	Apprentice from all training providers will be treated equally with no preferential treatment for IL.  Clearly defined contracts between In2assessments and employers will help to clarify time scales, rates and inclusions and exclusions set within the contract.	Governing Committee will review this at each quarterly meeting.	
R6	<b>Relationships between In2Assessments and companies in the Inspiring Learning Group – influence to ‘pass’ apprentices from the IL group</b>	Unconscious, or conscious positive discrimination of IL learners influencing the outcome of assessment.	IL have no influence on the outcome of assessment, and this will be closely monitored by In2assessments who will report pass rates for all learning by each training provider to the Governance Committee on a quarterly basis and any anomalies investigated.	Head of assessment, Governance Committee.	
R7	<b>Relationships between In2Assessments and companies in the Inspiring Learning Group – shared services</b>	Recruitment of staff for both training and assessment positions within the group. As staff will have similar qualifications and background spec.	Initially In2assessments will be backed and financed by Inspiring Learning during start up and during the early period of growth. In2assessments will be able to continue to draw down support for various management practices including IT, HR etc. even when it has its own financial security.	Head of Assessments	

Number	Area of potential conflict of Interest – and who / what does it relate to	What is the potential conflict of interest.	How is the potential conflict interest mitigated or removed	Who is responsible for monitoring the COI	Comments
			<p>Recruitment will be mainly handle internally by In2assessments with some support from the IL recruitment team to increase marketing and promotion. Any on-boarding of staff within a full time compacity will be managed by the HR team at IL.</p> <p>IT services will be provided for employed staff as and when required. As most staff will be freelance, access to systems will be mainly through the third party online secure system.</p> <p>Management charges from IL will be just 5% of the turnover of the business. The main demands will be on HR to recruit and on-board new staff and Marketing to grow the business, including a budget to develop a new website to fit within the branding of the group.</p> <p>An IT budget will be set based on the number of full time employees and also fees for third party EPA software – Estimated to be around £10K depending on intake.</p>		
R8	<p><b>Relationships between In2Assessments and companies in the Inspiring Learning Group – influence on who is recruited</b></p>	<p>IL could, in theory, insist on recruitment only from within the IL group that may not meet the requirements or have been involved in the training of apprentices.</p>	<p>Recruitment of assessors and verifiers will be managed by In2assessments, with the support for recruitment process, from the IL HR team.</p> <p>Applicants will be vetted, and any conflicts of interest identified where they may have been involved in the training and development of apprentices.</p> <p>Due to range and location of centres in the group, assessors recruited from within the group could be easily deployed into centres where they would have had no</p>	Head of Assessments	

Number	Area of potential conflict of Interest – and who / what does it relate to	What is the potential conflict of interest.	How is the potential conflict interest mitigated or removed	Who is responsible for monitoring the COI	Comments
			<p>interaction or contact with candidates they were due to assess.</p> <p>All staff will be processed through the HR department for background checks including references and DBS. Conflicts of interests and other declarations will be followed up, and continually monitored, by In2assessments.</p>		
R9	<b>Relationships between In2Assessments and companies in the Inspiring Learning Group –</b> management of budget	Budget restrictions imposed by financial director/department that limits ability for In2assessments to be able to meet delivery demands.	Budgets set at the beginning of financial year based on predicted forecast. Any significant increase of business will be reviewed with the Governing Committee and addressed by the Governing Body.	Governing Committee	
TP1	<b>Third Parties –</b> Assessors involved in the apprentices training and development	Contracted assessors used by In2assessments may have, or still do, work for a training provider at which an apprentice has been trained	<p>All assessors must complete a COI declaration at the start of their contract and (at least) annually and where they are identified as having involvement, they will not be used with that training provider.</p> <p>In addition, at the point where an assessor is assigned to assign to assess an apprentice a second check is made to ensure the assessor has had no involvement (for example, they may have been transferred from another provider)</p>	The Head of In2assessments	
TP2	<b>Third Parties –</b> The EPA assessor knows or has a relationship to apprentice	The In2 assessment assessor for EPAO has some type of relationship to the apprentice that may have the potential to influence their assessment decision(s)	<p>All assessors must complete a COI declaration at the start of their contract and (at least) annually and this will include the inclusion of stating know apprentices (e.g. relatives, friends or children of friends)</p> <p>In addition, at the point where an assessor is assigned to assign to assess an apprentice a second check is made to ensure the assessor has no knowledge of the apprentice e.g. relative, friend etc.</p>	The Head of In2assessments	



Number	Area of potential conflict of Interest – and who / what does it relate to	What is the potential conflict of interest.	How is the potential conflict interest mitigated or removed	Who is responsible for monitoring the COI	Comments
			All assessors will also be asked to confirm on the assessment documentation that they have no COI.		
<b>TP3</b>	<b>Third Parties</b> – an assessment author having knowledge of the assessment content	Contracted Authors may have knowledge of the EPA assessment content which they could use to train apprentices in the content of the assessment (should they also be working for a training provider)	<p>In2assessments recognise that this is COI that may often need to be mitigated, rather than removed, as the industry experts who would be accessed to support assessment could often be training the same subject.</p> <p>All assessors must complete a COI declaration at the start of their contract and (at least) annually and this include whether the individuals are delivering training elsewhere and a confidentially agreement and contract will be in place to cover this. In2assessment will also reserve the right to observe the authors delivery of training.</p>	The Head of In2assessments	
<b>TP3.5</b>	<b>Assessors from other areas in the group</b>	Where Assessors may know or have interacted with apprentices prior to assessment.	All assessors will be required to submit a COI declaration highlighting their work schedule for the time period of the apprentices training period. Any relationship between the two will automatically eliminate the assessor from these particular apprentice EPA's.	EPA Manager	
<b>TP4</b>	<b>Third Parties</b> – Quality assurance staff	The In2 assessment IQA for EPAO has some type of relationship to the apprentice, assessor, or employer that may have the potential to influence their assessment decision(s)	<p>All staff will be vetted, and any COI declared between IQA and Assessor staff. Where there are any COI, then staff will not be able to verify any assessments of know parties.</p> <p>Where there is a clear link or a COI between the IQA, or the assessor with the employer, that impacts on the assessment process, the these individuals will not be involved in the assessment process.</p>	EPA Manager	

Number	Area of potential conflict of Interest – and who / what does it relate to	What is the potential conflict of interest.	How is the potential conflict interest mitigated or removed	Who is responsible for monitoring the COI	Comments
			By using freelance assessors, there is greater opportunity for more independent assessors and IQA's.		
G1	<b>Governance, Management and Staff</b> – Directors of In2assessments (the Governing Body) are also directors of all other IL companies.	Directors could try and impose a level of bias towards its own group apprentices. Directors' involvement in both the RoTAP organisation – Skern Training & Skills and In2assessments.	The Governing Body made up of both the Directors will devolve control of In2assessments to the Governing Committee. The Committee will be made up of an external chair plus three additional external committee members. The Governing Committee will have control over the governance of In2assessments, with the directors having no voting rights on the Committee.	Governing Committee	
G2	<b>Governance, Management and Staff</b> – CEO of IL	<ol style="list-style-type: none"> <li>1 Alex Williamson is part of the Governing Body (is listed as a Director on Companies House) of Skern Lodge (which incorporates Skern Training &amp; Skills).</li> <li>2 Director of Kingswood, Skern Lodge which employs most of IL's apprentices.</li> </ol>	To provide a level of mitigation, the governing body will empower the governing committee through an external chair and additional external committee members to support or question decisions made by the management team of Ellie Websdell and Barry Kaufman-Hill. Although Alex will sit on the Governing Committee, he will not have any voting rights.	Governing Committee	
G3	<b>Governance, Management and Staff</b> – FD of IL	<ol style="list-style-type: none"> <li>1. Nick Hales is also on the Governing Body (is listed as a Director on Companies House) of Skern Lodge (which incorporates Skern Training &amp; Skills).</li> <li>2. Control of budgets for apprenticeships across the group</li> </ol>	To provide a level of mitigation, the governing body will empower the governing committee through an external chair and additional external committee members to support or question decisions made by the management team of Ellie Websdell and Barry Kaufman-Hill. Although Nick will sit on the Governing Committee, he also will not have any voting rights.	Governing Committee	
G3.5	<b>Governance, Management and Staff</b> – Barry's work in other parts of IL. The Head of In2assessments has previously worked for Skern Lodge	The Head of In2assessments could have a level of bias towards these two centres over other parts of the In2assessments business.	All business delivery will be reviewed by the Governing Committee, to ensure that no bias is shown to any specific client over another. The Head of In2assessments will have no voting rights	Governing Committee	

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	since 1989 and is supports the team at another IL centre in North Devon.		regarding decisions based on their own actions.		
<b>G4</b>	<b>Governance, Management and Staff</b> – Directors of In2assessments (the Governing Body) are also directors of all other IL companies.	This includes Skern Training & Skills who are a listed RoTAP organisation. The potential conflict is the possible influence of the directors to prioritise IL personnel over other clients.	Through a well-structured Governing Committee, made up of a balance of internal and external personnel. The Committee will ensure that any potential influence is prevented or removed if discovered. The Governing Body members will have no voting rights within the Committee, and will subject to the recommendations of the Committee.	Governing Committee	
<b>G5</b>	<b>Governance, Management and Staff</b> – Directors influencing assessment process	Directors trying to influence the outcome of assessments to ensure that IL apprentices achieve their apprenticeship within a given period to minimise cost or to ensure staff are deployed to meet high demand.	All assessments will be subject to the required timeframes for gateway and will be scheduled for EPA within the regulated timeframes. The EPA Manager and the Head of In2assessments will ensure that schedules and timeframes fit within the appropriate timeframes.	Governing Committee	
<b>G6</b>	<b>Governance, Management and Staff</b> – investigation into appeals and complaints	1.Failure to address a complaint or appeal 2.Insufficient investigation into a complaint or a raised appeal 3, Investigation of complaint or appeal carried out by an appropriate person  4. Working relationship of complainant, too close to appointed investigator.	All appeals and complaints will be brought to the governing committee to present findings and to report outcomes. Where the complaint has been brought against the management of In2assessments, it will be the responsibility of the chair of the committee to convene a panel to determine the outcome of the complaint. It is predicted that most appeals and complaints will be able to be dealt with by the Management Team, but where there is a more demanding case, it will be the responsibility of the Governing Committee to appoint an independent panel to determine the outcome.	Governing Committee	
<b>G7</b>	<b>Governance, Management and Staff</b> – investigation into malpractice	1.Failure to address a malpractice incident.	The severity of the malpractice will determine the nature of the response. Where the severity is low the malpractice	Governing Committee	

Number	Area of potential conflict of Interest – and who / what does it relate to	What is the potential conflict of interest.	How is the potential conflict interest mitigated or removed	Who is responsible for monitoring the COI	Comments
		<p>2. Insufficient investigation into a malpractice</p> <p>3. Investigation of a malpractice carried out by an inappropriate person.</p> <p>4. Working relationship of person being investigated too close to appointed investigator.</p>	<p>will be dealt with by the management team and the findings or actions of this reported to the Governing Committee. Where the severity is high, the actions and the level of investigation will be managed by the Governing Committee and where necessary the appointment of an independent panel.</p>		

## **How we identify and manage conflicts of interest**

As an employer, In2assessments starts from a position of trusting the professionalism of the staff it employs, and this trust underlies any attempt to handle questions which raise potential conflicts of interests.

In summary, the Conflicts of Interest are managed in a three-fold approach:

- Disclose always
- Manage the conflict in most cases
- Prohibit the activity when necessary to protect the interests of In2assessments

### **1 Process**

- 1.1** Employees are responsible for disclosing potential conflicts of interest, and/or commitment. Reporting mechanisms for disclosure should begin with the individual's line manager and through them to the Head of In2assessments, or in cases of the Governing Body or members of the Governing Committee, these should be submitted for other members of the Governing Committee to record and action. In all cases the disclosure and its outcome shall be noted. Where a real or potential conflict of interest exists this, together with the agreed outcome, shall be noted on the individual's personal file.
- 1.2** Consultants to In2assessments are also required to divulge and personal or family financial holdings or situations that could create a conflict of interest and/or introduce bias into their professional judgement. Such disclosure should be made to In2assessments, and appropriate determination shall be made on the management of any conflict.
- 1.3** Disclosure in all cases shall include the type of potential conflict (conflict of interest or commitment), the nature of the activity, a description of all parties involved, the potential financial interests and rewards, possible violations of legal requirements, and any other information which the employee feels necessary to evaluate the disclosure. The line manager shall advise the Head of In2assessments of all disclosures. The Head of In2assessments also may serve as an advisor to staff members who are uncertain regarding the appropriateness of a given activity or management of a given disclosure issue. It is, therefore, incumbent upon the Head of In2assessments to be familiar with In2assessments

policy, and with general legal requirements so as to understand fully the implications of the situation in question. The Head of In2assessments may need to consult or engage with others to advise on issues of budget, finance, and technology transfer, as appropriate.

**1.4** After appropriate evaluation, the line manager may find that a proposed situation or an employee’s personal interests show no conflict or apparent conflict and are acceptable without further review. Conversely, the line manager may determine that a given situation raises some questions of propriety and requires a higher level of review. For each situation, the line manager shall create a written record of his or her determination that the situation either is acceptable, unacceptable, or requires review at a higher level.

**1.5** The tables below indicate the levels at which review should take place for all staff, with any individual always disclosing to their line manager, and that line manager referring the case to the next higher level of management as appropriate:

<i>Employee’s or contracted staff of In2assessments:</i>
Member of staff
Line Manager (EPA Manager)
Head of In2assessments
Governing Committee

<i>Senior Members of In2assessments:</i>
Head of In2assessments
Governing Committee

## **2 Evaluating Disclosures**

**2.1** Those evaluating disclosures at each level of review need a framework for determining the permissibility of activities and for assessing the degree to which disclosed activities may pose a risk to the staff member, the organisation, and other entities that may be affected. The appendix to this document list simple questions for use in evaluating potential conflicts of interest or commitment. The list is not exhaustive and other questions related to special circumstances should be added as appropriate.

- 2.2** When presented with the facts of a given situation, the reviewer must determine if there is a legitimate cause for concern related to the inappropriateness of behaviour or evidence of bias by the professional activities of the staff member. The list of questions in Appendix A is suggested for this initial determination.
- 2.3** If it appears that there is genuine cause for concern, the reviewer must ascertain whether appropriate controls are in place to deal with possible conflicts.
- 2.4** If the reviewer is uncertain as to the correct way in which to deal with a situation, they should refer the matter to the next level of management or consult the appropriate body or department for advice.
- 2.5** The consequences of failure to comply with these regulations will be dealt by the line manager, including where necessary via appropriate disciplinary procedures.

## **Conflicts of Interest Regulations – Appendix A**

### Questions for evaluating potential conflicts of interest

1. Has all relevant information concerning the staff member's activities been acquired (i.e., has there been full disclosure)?
2. Do the staff member's relevant financial interests suggest the potential for conflicts or the appearance of conflicts or bias?
3. Do the staff member's reported time commitments exceed permissible levels?
4. Is there any indication that the staff member in his or her professional role has improperly favoured any outside entity or appears to have an incentive to do so?
5. Has the staff member inappropriately represented In2assessments to outside entities?
6. Does the staff member appear to be subject to incentives that might lead to conflicts of interests or bias?
7. Is the staff member involved in a situation that might raise questions of bias, inappropriate use of In2assessments assets, or other impropriety?
8. Could the staff member's circumstances represent any possible violation of applicable legal requirements?
9. Do the current engagements of the staff member represent potential conflicts between outside interests (e.g., working on projects simultaneously for competing business entities)?
10. Could the proposed activity withstand public scrutiny?



## **Conflicts of Interests Regulations Appendix B**

### Register of interests

Where the possibility of conflicts of interests exists, it is universally accepted that prior declaration by all parties of their interest is essential. A Register of Interests is kept of the personal interests of staff, both full and part time, which overlap with the interests of In2assessments. Thus, members of staff, in addition to declaring their interests as employees of In2assessments are asked to provide details of work carried out externally that may have impact on the work of In2assessments. This includes any directorships, consultancy, or committee membership that a director or senior manager may have in addition to their role with In2assessments. For those involved in the assessment process, they should declare any prior involvement internal or external in the training and assessment of apprentices within the sectors they are being contracted to assess.

### On Recruitment

All employees, Committee Members and freelance are required to declare any external or internal conflicts of interest prior to undertaking their potential position. This will be sought on acceptance of the post or contractual dates.

### Annual Return

All members of staff are required to complete and submit, or review and confirm, an Annual Return in October of each year. Please note a null return is required if there are no relevant external interests.

Prior to submission the Return may be discussed with your line manager or with the Head of In2assessments, who is best placed to understand how external activities overlap with In2assessments activities.

**IMPORTANT NOTE:** This Return does not in any way replace or supersede the requirement for staff to seek permission from the Head of In2assessments or the EPA Manager for certain activities, as set out in the terms and conditions of the contract.

In addition, staff are reminded that failure to declare a significant interest is potentially a disciplinary matter and therefore staff are advised to declare such an interest if they are in any doubt about its relevance or materiality.

## Appendix C - Conflicts of Interest: Declaration

Actual, potential or perceived conflicts of interest could arise from any of the following (the list is not exhaustive – please indicate any possible interest that you may have):

- Current or previous employment as a subcontractor, tutor or programme manager – with any other awarding body, or educational institution
- Appointment to a board, committee, tribunal panel of any other awarding body, or educational institution
- Membership of a professional body with an interest in the development, delivery or award of qualifications
- Other contractual relationship with In2assessments, e.g. consultants
- Personal or professional relationship with a candidate who is undertaking a In2assessments qualification

<b>Full Name</b>	
<b>Job Role</b>	
<b>Address</b>	
<b>Telephone Number</b>	
<b>Email Address</b>	

Information for declaration must include:

- The type of interest
- The nature of the interest
- A description of all parties involved in the interest (financial or non- financial) and any other relevant information, e.g. name of candidate.

<b>Declaration</b>

I declare that I will not involve myself in the assessment, delivery or award of a In2Assessment qualification if approval against the above conflict of interest is withheld by In2Assessment.

Signed \_\_\_\_\_ Date \_\_\_\_\_



## Appendix E: Subcontractor register of Interests

In2assessments will maintain this document routinely, and review at appropriate management meetings.

Full Name	Job Role	Interest declared (yes/no)	Nature of interest (brief description)	Reviewed by	Action taken	Notes

## Appendix F: Employee Register of Interest

In2assessments require that this document is maintained routinely and available to it upon request.

Full Name	Job Role	Interest declared (yes/no)	Nature of interest (brief description)	Reviewed by	Action taken	Notes