

## **Conflict of Interest Policy End Point Assessment**

### **Introduction**

As an End Point Assessment Centre cHRySOS HR Solutions Ltd is required to have in place a conflict of interest policy. This policy is to enable cHRySOS HR to identify, manage and mitigate conflict of interest. All staff and associates of cHRySOS HR have a responsibility to be aware of the potential for a conflict of interest.

### **Purpose**

The purpose of this policy is to protect our integrity as a business and the integrity of our position as an End Point Assessment Organisation and a provider of training and qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of cHRySOS HR's business as a training provider and End Point Assessment Centre.

This policy:

- defines what is meant by conflict of interest
- describes the role of conflict of interest in the context of working with, or for, an End Point Assessment Centre
- sets out the responsibilities for managing conflict of interest

### **Scope of policy**

This policy applies to all staff and associates that interact or potentially interact with the work of cHRySOS HR's End Point Assessment centre and Training and Qualification business streams. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with cHRySOS HR's qualifications, tests and assessments, and supporting resources and services.

The individuals falling within the scope of this policy include Directors, employees and any associates.

### **Definition of conflict of interest**

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances relating to training and end point assessment organisation activity, for example:

- where the organisation has both a training delivery function and an End Point Assessment function within one umbrella organisation
- when an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation
- when an individual has interests that conflict with his or her professional position where someone works for or carries out work on cHRySOS HR's behalf, but may have personal interests – paid or unpaid – in another business which either uses cHRySOS HR products or services, or produces similar products
- where someone works for or carries out work on cHRySOS HR's behalf, who has friends or relatives taking end point assessment or examinations with cHRySOS HR

## Principles

### As an End Point Assessment Centre, cHRysos HR will:

- Ensure that when the training and qualification delivery business streams of cHRysos HR create and follow a procedure, it does not conflict with cHRysos HR's regulatory responsibility as an End Point Assessment Centre.
- Review our processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.
- Ensure that the contractual arrangements with our staff and associates clearly set out any obligations on them to manage conflicts of interest arising from other activities that they undertake
- Ensure that cHRysos HR is not involved in both Apprenticeship on-programme delivery and End Point Assessment of an Apprenticeship standard in the same organisation
- Ensure that anyone who has access to confidential assessment material for a qualification is not permitted to deliver or be present at training events on that qualification.
- Ensure that clear arrangements are in place to prevent the conflict of interest in relation to the development of assessment activities such as question banks, and the administration and marking of those tests.
- Ensure that all members of staff declare any conflict of interest for friends or family sitting upcoming cHRysos HR examinations or End Point Assessment.
- Ensure that where End Point Assessment activities are to be hosted at an employer or training provider premises that the confidentiality of any assessment activity materials such as tests is maintained and that invigilation of any tests is undertaken by an individual independent of the employer or training provider.
- Ensure that where any conflict of interest declared has an impact on the individual's role as an End Point Assessor, action taken may include removing that individual from any involvement in End Point Assessment or alternatively, referring their assessment decisions to another End Point Assessor without a conflict of interest.

## Responsibility

The ultimate responsibility for the conflict of interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Managing Director.

## Management

1. The Consultancy and Academic Services Manager and End Point Assessment Lead/Lead Internal Verifier are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.
2. All managers are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.
3. Management meetings are required to give appropriate attention to potential or actual conflicts of interest.
4. Managers are responsible for ensuring that all new staff receive a conflict of interest briefing.

5. Any potential or actual conflict of interest must be documented within team meetings/one to one meetings. The manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the Managing Director. All records are required to be available for audit purposes.
6. Individuals within cHRyos HR have responsibility for ensuring that they are familiar with the Conflict of Interest Policy and any guidelines and complete any required conflict of interest training.
7. The most important feature of the policy is the requirement that an individual disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether or not it represents a conflict of interest it must be reported.
8. Actual, perceived or potential conflicts of interest should be documented by the individual using the Conflict of Interest Declaration Form at **Appendix 1** and submitted to their manager/the Consultancy and Academic Services Manager.
9. The individual and manager are equally responsible for ensuring that the issue is documented carefully.
10. Any necessary action in relation to the declaration of a conflict of interest should be documented and reviewed annually to establish an up to date position.
11. An individual may wish to raise concerns relating to conflict of interest directly with the Managing Director. This may be done in confidence and they are entitled to receive a response to their concerns. Individuals are protected under the company's Whistle Blowing Policy.
12. Any staff member considering paid or unpaid work outside cHRyos HR should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their manager first. The manager should speak to the Managing Director if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with cHRyos HR's activities.
13. Prior to each End Point Assessment or examination series all staff and other individuals, must inform cHRyos HR of any learners being entered for its examinations and End Point Assessments who are family members, other relatives or friends. They are asked to declare this information to their manager or the Consultancy and Academic Services Manager.

### **Monitoring and escalation**

1. The Consultancy and Academic Services Manager is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level within the business and, when necessary, to the Managing Director.
2. The Consultancy and Academic Services Manager will begin an investigation of any issues identified within 48 hours (In the Consultancy and Academic Services Manager's absence the End Point Assessment Lead/Lead Internal Verifier will begin the investigation). A preliminary report will be made available to the Managing Director and manager concerned within 5 working days.
3. Any conflict of interest declared by any individual will be reviewed and evaluated annually to establish any change of circumstances.

**Advice and guidance**

Any required guidance or interpretation on potential conflicts of interest should be directed to the Consultancy and Academic Services Manager.

**Policy review date:** February 2019

**Appendix 1**

**Conflict of Interest Declaration**

Actual, potential or perceived conflicts of interest could arise from any of the following situations:  
(This list is not exhaustive)

- when an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation
- when an individual has interests that conflict with his or her professional position where someone works for or carries out work on cHRyos HR’s behalf, but may have personal interests – paid or unpaid – in another business which either uses cHRyos HR products or services, or produces similar products
- where someone works for or carries out work on cHRyos HR’s behalf, who has friends or relatives taking End Point Assessment or examinations with cHRyos HR.

<b>Full name</b>	
<b>Job role</b>	
<b>Address</b>	
<b>Telephone number</b>	
<b>Date</b>	

Information relating to the 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)
- Any other relevant information.

<b>Declaration</b>
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I declare that I will not assess, invigilate, moderate or internally verify any candidate/Apprentice or their assessments until I have been given approval against the above conflict of interest by cHRyos HR Solutions Ltd.

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