

NSHCS Apprenticeship End Point Assessments: Conflict of Interest Policy

1. Introduction and purpose

1.1 This policy applies to the Healthcare Science Apprenticeship End Point Assessments (EPA) provided by the National School of Healthcare (NSHCS) - henceforth referred to as the School.

1.2 The principle purpose of this policy is to protect the interests of the apprentices taking the EPA provided by the School and the integrity of the School as the provider of the assessment.

1.3 The policy will enable the School, as the provider of the EPA, to identify, manage and mitigate any conflicts of interest, both actual and perceived, when engaging staff and contributors for the development, administration, delivery and marking of the EPA elements.

1.4 The policy will be facilitated by training and guidance for all School staff. EPA contributors and relevant others on recognising and managing possible conflicts of interest, be they perceived or actual, that may arise in circumstances such as those detailed below.

2. Scope of policy

2.1 This policy applies to:

- a) All those involved in the development, administration, delivery and marking of the apprenticeship EPA including staff and contributors.
- b) Any School staff or stakeholders involved in other School business that may lead to a conflict of interest such as advice, support and guidance offered to apprentices, providers or employers on the education and training of the apprentice leading to the EPA.
- c) Anyone else involved with the School in any activity from which there is potential for conflicts of interest with the School as a provider of the EPA.

3. Definition of conflict of interest

3.1 A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. The conflict of interest may adversely affect their judgement or influence their objectivity when making decisions if it is not properly managed.

3.2 Conflicts of interest may arise when an individual is engaged to contribute to the EPA and:

- Is directly involved in the apprentice's programme of learning or assessments;
- Is not directly involved in the apprentice's programme but is employed by an organisation with an interest in their apprentice's completion of a programme;
- Line-manages the apprentice;
- Has friends or relatives taking the apprenticeship programme to which the EPA is aligned.

3.3 Conflicts of interest can arise in a variety of circumstances relating to the School's activities, for example (but not exclusively):

- Where the School is involved in an advisory or training function for the programme and is also delivering the end point assessment.
- When an individual has a position of authority with the School that conflicts with their interests or responsibilities in another organisation.
- When an individual has interests that conflict with their professional position.
- Where someone works for or carries out work on the School's behalf, but may have personal interests – paid or unpaid – in another business which either uses the services/products of the School, or produces similar products.
- Where someone works for or carries out work on the School's behalf and has colleagues, friends or relatives taking end point assessment provided by the School e.g. and apprentice employed at the same workplace as an EPA assessor engaged by the School.

4. Principles for management

4.1 The School's senior management will ensure that:

- Processes and procedures are in place that enable the policy to be enacted and managed;
- All conflicts of interest are reviewed fairly and objectively;
- Any involvement in the advice, support or training of the apprentice or apprenticeship programmes provided by the School does not conflict with the independence of the School's end point assessment unit and its processes;
- The contractual arrangements with contributors to the EPA clearly set out any obligations on them to declare and manage conflicts of interest arising from other activities that they undertake;
- Anyone who has access to confidential assessment material for the EPA is independent of the apprentice, their training and their employer;
- All members of the School's staff declare any interest regarding friends or family taking the apprenticeship programme and associated EPA; and

- The policy and processes associated with it are regularly reviewed for fitness for purpose.

5. Register

5.1 The School's EPA assessment unit will maintain a register of its contributors appropriately updated with details of any conflicts of interest declared by the members in order to ensure independence when selecting individuals for the development, administration, delivery and marking of the EPA.

6. Management process

6.1 The School's EPA assessment unit will be responsible for ensuring that all within the scope of this policy are aware of the requirements of the Conflicts of Interest Policy.

6.2 All School staff and in particular EPA administration staff and EPA contributors will be appropriately trained to recognise and report any potential or actual conflicts of interest.

6.3 Any identified potential or actual conflict of interest will be documented and passed to the School's Apprenticeship Lead to either resolve the issue or, for issues that cannot be resolved at this level, escalate the issue to the School's senior management team for advice and guidance.

6.4 Resolution will be on the basis of ensuring the interests of the apprentice is uppermost and complies with the principles and purpose of the end point assessment.

7. Responsibility

7.1 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 School's senior management.

7.2 In some cases, it may be necessary for the School's senior management to seek advice on the resolution from the EPA's external quality assurer, the Academy for Healthcare Science, in order to manage the conflict of interest.

8. Advice and guidance

8.1 Any required guidance or interpretation on potential conflicts of interest will be directed in the first instance to the Apprenticeship Lead.

8.2 All policies related to the School's EPA provision will be publically available on the School's website for review by apprentices, employers and all other interested parties:
<http://www.nshcs.hee.nhs.uk/join-apprenticeships/apprenticeships>

Policy review date: every 2 years from implementation