



# Conflict of Interest

## Eastern Region Training Group

### **Introduction**

As an end point assessment centre Eastern Region Training Group (ERTG) is required to have in place a conflict of interest policy. This policy is to enable ERTG to identify, manage and mitigate conflict of interest. All staff, consultants and partners organisations have a responsibility to be aware of the potential for a conflict of interest.

### **Purpose**

The purpose of this policy is to protect ERTG's integrity as a business and the integrity of its qualifications. The policy is also designed to protect ERTG staff by providing guidance on handling possible conflicts of interest that may arise as a result of ERTG 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, consultants and partner organisations that interact or potentially interact with the work of ERTG end point assessment centre. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with ERTG qualifications, tests and assessments, and supporting resources and services.

The individuals falling within the scope of this policy include directors, employees, contractors, home workers, agency workers and any associate staff, including assessment associates, verifiers/examiners and freelance staff.

### **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 awarding organisation activity, for example:

- where the organisation has both a training delivery function and the 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 ERTG's behalf, but may have personal interests – paid or unpaid – in another business which either uses ERTG products or services, or produces similar products
- where someone works for or carries out work on ERTG's, who has friends or relatives taking ERTG assessments or examinations

## **Principles**

As an end point assessment centre, ERTG will:

- Ensure that when the Training delivery arm of ERTG creates and follows a procedure, it does not conflict with ERTG'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 assessment associates clearly set out any obligations on them to manage conflicts of interest arising from other activities that they undertake
- 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 all members of staff declare any interest in friends or family sitting upcoming ERTG

## **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 Quality Manager.

## **Management**

Managers are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.

- All teams are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.
- Management meetings are required to give appropriate attention to potential or actual conflicts of interest.
- Managers are responsible for ensuring that all new staff receive conflict of interest training.
- Any potential or actual conflict of interest must be documented within Team Meetings/ 121's. The Manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the Quality Manager.
- Individuals within ERTG have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete any required conflict of interest training.
- All individuals will be required annually to read and understand the Conflict of Interest Policy.
- 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 it represents a conflict of interest report it!
- The individual and Manager are equally responsible for ensuring that the issue is documented carefully.
- An individual may wish to raise concerns relating to conflict of interest directly with the Quality Manager. This may be done in confidence and they are entitled to receive a response to their concerns. NB individuals are protected under the company's Whistle Blowing Policy

- Any staff member considering paid or unpaid work outside ERTG 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 Company 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 ERTG.
- Prior to each examination series all staff and other individuals, must inform ERTG of any learners being entered for its examinations and other assessments, who are family members, other relatives or friends. They are asked to declare this information to the Quality Manager.

### **Monitoring and escalation**

The Quality 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 Company Director.

The Quality Manager will begin an investigation of any issues identified within 48 hours (In the Quality Manager's absence the Quality Nominee will begin the investigation). A preliminary report will be made available to the Company Director and manager concerned within 5 working days.

### **Advice and guidance**

Any required guidance or interpretation on potential conflicts of interest should be directed to the Quality Manager.

### **Related Policies**

Whistle Blowing Policy

Malpractice Policy

Fraud Policy

