

CONFLICTS OF INTEREST POLICY

1. PURPOSE

Doran Scott Williams & Co Ltd, which trades as DSW Consulting (DSW), has been accepted onto the Register of End Point Assessment Organisations (RoEPAO).

This policy exists to ensure that any potential conflicts are identified and managed appropriately in a transparent and consistent way.

2. SCOPE

This policy will apply to all members of DSW's staff and our associate population who are involved in the development, delivery and administration of End Point Assessments which includes but is not restricted to:

- The Senior Management Team
- The Operations Team
- The Product Team
- The Quality Team
- Relationship Managers
- End Point Assessors
- IQAs

3. DEFINITIONS

Ofqual defines a conflict of interest to exist in relation to an awarding organisation where:

- Its interests in any activity undertaken by it, on its behalf, or by a member of its group have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in a way that complies with its Conditions of Recognition,
- A person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in a way that complies with the awarding organisation's Conditions of Recognition, or
- An informed and reasonable observer would conclude that either of these situations was the case.

Ofqual Condition A4, Conflicts of Interest, outlines the obligations on awarding organisations in relation to Conflicts of Interest. Specifically, it states that awarding organisations must:

- Identify and monitor all Conflicts of Interest which relate to it, as well as any scenario in which it is reasonably foreseeable that any such Conflict of Interest will arise in the future (Condition A4.1),
- Establish and maintain an up to date record of all Conflicts of Interest which relate to it (Condition A4.2),
- Take all reasonable steps to ensure no Conflict of Interest which relates to it has an Adverse Effect (Condition A4.3),
- In any case where a Conflict of Interest nonetheless results in an Adverse Effect, take all reasonable steps to mitigate the Adverse Effect as far as possible and correct it (Condition A4.4), and
- Establish, maintain and comply with a written conflict of interest policy (Condition A4.7).

DSW has a responsibility to identify, manage and mitigate potential, perceived, and actual conflicts of interest and will do so by following the process outlined in this document.

A copy of this policy is stored on SharePoint.

4. PROCEDURES

EXAMPLES AND CONSIDERATIONS REGARDING CONFLICTS OF INTEREST

The following paragraphs provide a non-exhaustive list of examples of Conflicts of Interest.

DSW STAFF ADDITIONAL PAID WORK

- Staff undertaking additional work can give rise to conflicts of interest.
- DSW staff are therefore barred from undertaking any additional paid work without written permission from the Managing Director or Chief Operating Officer.

CONFLICTS ARISING FROM PRE-EXISTING RELATIONSHIPS.

In common with many Awarding Organisations and End Point Assessment Organisations, DSW makes extensive use of associates to support the design and delivery of assessments.

In addition, we hire experienced individuals from within the Assessment, Training and Financial Services sectors. This can give rise to several conflicts including:

- An individual has worked for an Apprenticeship Training Provider with whom DSW has a contract to conduct End Point Assessments
- An individual has worked for an Employer with whom DSW has a contract to conduct End Point Assessments
- An individual has a pre-existing relationship, whether professional or personal, with an Apprentice

The following rules are in place to identify and mitigate against these conflicts:

- An Assessor or IQA cannot assess or QA an apprentice with whom then have a prior relationship.
- An Assessor cannot assess any Apprentice who has been trained by an ATP for whom the Assessor has worked in any capacity in the last 12 months.
- An Assessor cannot assess any Apprentice who is employed by an organisation for which the Assessor has worked in any capacity in the last 12 months without the approval of the Head of Apprenticeships or Chief Operating Officer. Approval will only be granted where there is significant separation between other roles carried out by the Assessor.
- DSW staff members should not be assigned to Clients (ATPs or Employers) where they have worked in any capacity in the last 12 months without the approval of the Head of Apprenticeships or Chief Operating Officer. Approval will only be granted where there is significant separation between other roles carried out by the staff member.

FINANCIAL CONFLICTS

One example of a financial conflict arising within the business is the potential for a particular standard to become financially non-viable. We mitigate against these risks by maintaining a broad portfolio of assessments and other business activities which enables us to support a managed exit when required, providing sufficient notice and avoiding any adverse effects on apprentices.

The decision to retire an assessment must be supported by two members of the Senior Management team.

PROCESS

REPORTING AND MANAGING CONFLICTS

- A Conflicts of Interest Register (Col Register) is maintained on SharePoint and reviewed monthly by the Quality Team.
- All DSW staff and associates involved in the design, development, delivery and administration of End Point Assessments are required to report potential, actual and perceived conflicts of interest (the conflict) to the Quality Lead.
- All assessors are required to confirm that they have read, understood and will comply with the Conflicts of Interest Policy on an annual basis.
- All assessors are required to report a conflict of interest as soon as they become aware of it.
- The Quality Lead will review the conflict, add it to the Col Register and convene a discussion with colleagues to agree and communicate the outcome and any actions arising.
- Where a potential conflict of interest is identified with an assessor in relation to a specific employer, training provider or apprentice, a lock is placed on EPA Pro which prevents the assessor from receiving allocations of affected apprentices.
- The Quality Lead will review progress against actions in a timely manner and record the progress and outcome within the Col Register.

AWARENESS

- On an annual basis, all DSW staff and associates involved in the design, development, delivery and administration of End Point Assessments are required to confirm that they have read, understood and will comply with the Conflicts of Interest Policy.
- On an annual basis, all assessors are required to confirm that they have read, understood and will comply with the Conflicts of Interest Policy.
- On an annual basis, DSW's Management Team are required to confirm that they have read, understood and will comply with the Conflicts of Interest Policy.

5. ROLES AND RESPONSIBILITIES

- The DSW Management Team are responsible for ensuring that DSW has a Conflicts of Interest Policy which is communicated and applied universally across the business.
- The Head of Apprenticeships is responsible for ensuring that the Conflicts of Interest Policy is reviewed on an annual basis.
- The Quality Lead is responsible for logging and managing all reported potential, actual and perceived conflicts.
- All relevant DSW staff and associates are responsible for complying with the Conflicts of Interest Policy including proactively reporting all potential, actual and perceived conflicts.

7. MONITORING AND REVIEW

- "This policy will be reviewed annually by the Governance Team to ensure it remains current and effective."