



**Insulation Environmental
Training Trust Ltd
IETTTL**

Conflict of Interest Policy

August 2019
Renewal date August 2020



Conflict of Interest Policy

Overview of the policy

Scope of the policy

This policy covers the delivery of Thermal Insulation End-Point Assessments (EPAs) which are subject to internal and external quality assurance.

Purpose of the policy

IETTLO is committed to the highest standards of integrity, openness and probity. We're committed to directly providing, and working with our partners who provide, a transparent and honest working environment that is free from wrongdoing, malpractice, or corruption. In line with the Public Interest Disclosure Act 1998 they can raise relevant disclosures relating to these matters to us.

The purpose of this policy is to allow our apprentices, staff, partners and other organisations to feel comfortable and secure in raising relevant disclosures, made in good faith and reasonably believed to be true, without fear of victimisation or other adverse repercussions. In particular, relevant disclosures are likely to be those which may be in conflict with our commitments as outlined above.

Who needs to know about the policy?

IETTLO will make the apprentices, staff and contractual staff who are involved in the design, delivery, management, assessment and quality assurance of the Thermal Insulation End-Point Assessments aware of, and familiar with, the contents of the policy.

Reviewing the policy

We will review this policy regularly and may revise it as required in response to the findings of any review.

Introduction

For the purpose of this policy a conflict of interest is defined as a situation in which an individual, or organisation, has competing interests or loyalties.

This policy applies to all partners working for or on behalf of IETTLO.

This policy is intended to set out the responsibilities on all partners in managing conflicts of interest in line with their contract/agreement and in supporting us to meet the requirements set out by the ESFA, Charities Commission and in the Ofqual Conditions of Recognition (A4.7).



All existing and reasonably foreseeable Conflicts of Interest will be identified by our organisation, and monitored in line with our standard procedures and escalated to the CEO where appropriate. These conflicts of interest will be monitored closely, particularly during periods of change, in order to mitigate the possible impact of any potential adverse effect.

Types of Conflict of Interest

Conflicts of interest can arise in a variety of circumstances in relation to our business activity, for example:

- when any End Point Assessor (EPA), partner and/or invigilator we appoint does not disclose any actual or potential conflict of interest
- when an individual has a position of authority in IETTLO which conflicts with his or her interests in another organisation
- when an individual has personal interests or relationships that conflict with his/her professional position
- when one part of IETTLO creates and follows a procedure that conflicts with its regulatory responsibilities as an End Point Assessment Organisation (EPAO)
- where an individual takes on additional paid work (on either an employed or self-employed basis) or voluntary work outside which conflicts with the work of IETTLO
- where an individual receives payment for some work they do for the charity, unless the payment complies with the relevant clauses of IETTLO's Memorandum and Articles of Association

Acknowledging a Conflict of Interest

If a conflict of interest arises or partners anticipate that it might arise, they need to let IETTLO know. We will work with partners to take steps to minimise any risks and resolve the issue. If there is any doubt whether or not an activity represents a conflict of interest – please report it.

Partners must not take on any such activities that could be deemed to compete or conflict with IETTLO's EPA activities.

We'll also monitor any conflicts of interest and may on occasion take steps to minimise any conflicts due to the level of the risk or the frequency that the risk occurs.

Managing Conflict

Any conflict of interest must be declared and recorded at least annually and these will be reviewed, maintained and evaluated.

Where further action is needed as a result of a declaration, this will be documented and managed accordingly; this may include removing the individual from any involvement in EPA.



Mandatory disclosure and confidentiality

Mandatory disclosures

It is imperative that the integrity of our assessments is maintained.

Our Regulator (Ofqual) has outlined some specific conditions that we must meet to protect the integrity across the sector. This includes the requirement that where certain things are identified (such as malpractice), or certain actions taken (such as when sanctions are applied), the Regulator must be informed.

Depending on the seriousness of the matter, we may be required to declare to our Regulator that we are no longer compliant due to an act or omission by partners which has put us in breach. In this event, we may have regulatory action directed against us, such as Monetary Penalties. In accordance with the Agreement for Provision of Services Relating to End Point Assessment, we reserve the right to direct such financial penalties against partners, should they be as a result of the act or omission.

Confidentiality

We may need to access confidential information. We will ensure that such information is kept secure and only used for the purposes of the investigation and in line with GDPR legislation. We will not normally disclose the information to third parties unless required to do so, e.g. to our Regulator and / or the Police or other relevant and / or Statutory Bodies.

Termination for Convenience

Our actions under this policy will be proportionate. Where possible, we will always try to work with our partners in resolving issues. However, nothing within this policy precludes us from invoking our right under our agreement to terminate our relationship with our partners.

Contact

If you have any queries about the contents of the policy, please contact IETTLO.

Email: iettl@tica.uk.com

Appendix A: Glossary of Terms

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Abbreviation or Term	Meaning
Contract	A contract may be a service level agreement (SLA), partnership agreement, contract for goods/services or any other signed agreement in place with our partners.
EPA	End-Point Assessment: An EPA is a collection of assessments that offers confirmation of knowledge, skills and behaviours (known as KSBs) for a particular role. It takes place once the apprenticeship training has been completed, and the apprentice is deemed ready to enter the Gateway for EPA. The EPA must be achieved before an apprenticeship certificate can be issued. The structure of an EPA is designed to ensure that those making a decision on the competency of an apprentice are totally unbiased. This means that an assessment must either be conducted by an independent third party, or in a way that ensures no party involved in the management or training of the apprentice can make the sole decision on competence and passing the EPA – via a panel of experts, for example.
EPAO	End-Point Assessment Organisation: an organisation providing EPA.
Gateway	When an apprentice reaches the end of their training, the employer (supported by the Independent Training Provider) will make the decision on whether or not the apprentice is ready to take the EPA – this decision process or stage is known as the “Gateway”.
ITP	Independent Training Provider: a person who delivers training to an apprentice to enable the apprentice to reach Gateway in conjunction with employers.
IEPA	Independent End-Point Assessor: a person who facilitates an unbiased assessment of an apprentice’s competencies against the KSBs of the standard.
LIEPA	Lead Independent End-Point Assessor: a person responsible for internal quality assurance and standardisation of all assessment practice within EPA and is the sector expert.
Ofqual	Office of Qualifications and Examinations Regulation: a government body regulating examinations, assessments, and qualifications in England and vocational qualifications in Northern Ireland.
Partner	This can be apprentices, employees, employers, external quality assessors, independent training providers and workers.