



UNIVERSITY OF LEEDS

CONFLICT OF INTEREST POLICY FOR INDEPENDENT ASSESSORS OR EPA EXTERNAL EXAMINERS

1. Overview

- 1.1 The University of Leeds is listed on the Apprenticeship Provider and Assessment Register (APAR) to deliver apprenticeship training on higher and degree apprenticeships as a “Training Provider”. The University is also an “End Point Assessment Organisation” (EPAO) on the APAR and is responsible for delivering end point assessment (EPA) on a number of integrated higher and degree apprenticeships¹.
- 1.2 EPA is the final independent assessment that takes place at the end of the apprenticeship training. All apprentices must complete an EPA. EPA is designed to test that the apprentice is competent in their occupation and is undertaken by assessors who are experts in, and respected by, the occupation. As EPAO the University must deliver the EPA as set out in the EPA Plan for the apprenticeship standard.
- 1.3 In degree apprenticeships where the training provider is also the EPAO, independence is more difficult to achieve than in non-integrated apprenticeships. The EPAO must therefore make the EPA as independent as possible and have policies and procedures in place to achieve this. The APAR Conditions of Acceptance state that EPAOs are required to make every effort to manage and mitigate any potential or real conflict of interest in the delivery of EPA². All assessors, and especially independent assessors, must not have an actual or potential conflict of interest relating to the end-point assessment of an apprentice³, without suitable mitigation in place.
- 1.4 All degree apprenticeship EPAs must have at least one Independent Assessor (IA) drawn from the occupation who is impartial and distinct from the on-programme delivery and employment of the apprentice. Specifically, they must not receive a personal benefit or detriment from the result of the assessment and must only deem an apprentice to be occupationally competent in accordance with the EPA plan’s grading descriptors.
- 1.5 As an Office for Student (OfS) registered provider and EPAO, the University must comply with condition B4 which requires providers to ensure that assessment is effective, valid and reliable and that awards are credible. An External Examiner is appointed by the University to have oversight of EPA delivery on each integrated and higher degree apprenticeship, in accordance with OfS guidance⁴. This is normally the external examiner who has oversight of the higher education qualification which is integrated in the apprenticeship. The EPA External Examiner feeds into the

¹ [OfS definition of an integrated degree apprenticeship](#) page 3, paragraph 5

² <https://www.gov.uk/government/publications/apprenticeship-provider-and-assessment-register-conditions-of-acceptance/apar-conditions-of-acceptance>

³ See IfATE – Assessors <https://www.instituteforapprenticeships.org/developing-new-apprenticeships/degree-apprenticeships/>

⁴ [OfS External Quality Assurance of Apprenticeship EPA for Integrated higher and degree apprenticeships](#)



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University's EPA quality monitoring processes and provides external quality assurance of our EPA delivery.

2. Definitions

- 2.1 **Conflict of Interest** – a situation in which an individual or the University as a whole has competing interests which could compromise, or appear to compromise, the outcome of an EPA. This covers both perceived and potential conflicts of interest, as well as actual conflicts of interest.
- 2.2 **End Point Assessment (EPA)** - an independent assessment of occupational competence that takes place once the apprenticeship training (practical period) is complete. All apprentices must complete an EPA, it is the final stage of an apprenticeship and must be passed for the apprenticeship to be awarded.
- 2.3 **End Point Assessment Organisation (EPAO)** – An organisation conducting the End Point Assessment. The University is the EPAO for our integrated Degree Apprenticeships. The EPAO is responsible for the apprentice's final assessment against the requirements of the apprenticeship standard.
- 2.4 **Independent Assessor (IA)** – Conducts the End Point Assessment as set out in the End Point Assessment Plan and makes valid assessment and grading decisions during the EPA. The IA is entirely independent of the training delivered, ensuring impartial assessment.
- 2.5 **EPA External Examiner** – provides external scrutiny of the EPA aspect of a higher or integrated degree apprenticeship, similar to how an External Examiner would provide external scrutiny of HE qualification assessments and awards. EPAOs should engage an External Examiner to undertake this role specifically for the EPA. Where appropriate, EPAOs should normally engage the existing External Examiner who has oversight of the HE award which is integrated in the apprenticeship (such as the degree) to undertake monitoring of the EPA delivery⁵.

The role of EPA External Examiner should not be confused with the role of Independent Assessor and vice versa.

3. Scope

- 3.1 This Policy applies to the University when it is acting as the EPA Organisation in integrated higher and degree apprenticeships that it is delivering. It also applies to any Independent Assessor and EPA External Examiner, as well as all staff, consultants and any other individual or organisation taking part in an EPA on behalf of the University.
- 3.2. This policy should be read in conjunction with the following University policies and documents:
 - [Anti-Bribery Policy](#)
 - [Apprenticeship Employer Complaints Procedure](#)
 - [Code of Conduct – Professional Behaviour and Relationships](#)

⁵ See EPAO External Examiner Monitoring, page 11: <https://www.officeforstudents.org.uk/media/d4649bbf-f6d6-49d0-8a16-3e322ba7f9a5/eqa-of-apprenticeships-end-point-assessments-guidance.pdf>



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- [Code of Practice on Whistleblowing](#)
- [Student Complaints Procedure](#)

4. Responsibilities and accountabilities

- 4.1 When acting as the EPAO for an integrated higher or degree apprenticeship it is delivering, the University and all those involved in delivering the EPA are required to ensure there is no potential or actual conflict of interest that could affect the objectivity and consistency of the outcome of EPA. In particular, the University must ensure that those delivering the apprenticeship training are not involved in the EPA, and must maintain distinct separation.
- 4.2 The recruitment process for Independent Assessors and EPA External Examiners at the University includes conflict of interest safeguarding.
- 4.3 For each EPA they deliver or support, Independent Assessors and EPA External Examiners must then also complete a Conflict of Interest declaration form (Annex A), to identify any potential conflicts of interest and allow for mitigation to be planned in response if it is required. Individuals will receive a list of apprentices and employers for each EPA they support and must submit a conflict of interest declaration before beginning work on the EPA. The form will be used to ensure any actual or perceived conflicts of interest are disclosed. Individuals are also expected to notify the [Apprenticeships Team](#) and Apprenticeship Programme Manager of any new conflicts of interest as they arise, to be recorded and managed in line with this policy.
- 4.4 **Actual, potential or perceived conflicts of interest** – these may include (but not be limited to) the following scenarios, whereby an individual involved in the EPA delivery:
- a. is employed by or has a position of authority within one organisation that conflicts with their interests in another organisation;
 - b. is employed in an organisation who is a direct competitor of the apprentice's employer;
 - c. is involved in the delivery of an apprenticeship programme to the same apprentice or group of apprentices;
 - d. has links to, or works (paid or unpaid) for the same organisation as the apprentice;
 - e. has a prior link to the apprentice or has an extended link to the apprentice's employer (such as via friends or relatives);
 - f. may receive a personal or business benefit or detriment from the outcome of the EPA.
- 4.5 Examples of mitigating actions to address actual or perceived conflicts of interest include:
- a. Reorganising the delivery of EPA by assigning another independent assessor to deliver the EPA. This minimises the risk that an EPA could be adversely affected where a conflict of interest is identified.
 - b. If replacing an independent assessor is not an option, transparent mitigation steps should be taken such as:
 - i. securing appropriate undertakings from the individual(s) concerned to protect the integrity of, and confidence in, the EPA (and the independent assessor).
 - ii. enhanced monitoring of a party's activity within the EPA process.
 - iii. in extreme cases, organising re-assessment via an alternative EPA organisation.



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- 4.6 Failure to declare an actual or perceived conflict of interest will be considered a matter of misconduct, to be addressed in accordance with the University's Conduct Procedures for staff⁶, and in accordance with the contractual terms of conditions for any individuals participating in EPA delivery who are not employees of the University of Leeds.
- 4.7 Responsibility for addressing any disclosed conflicts of interest sits with the Apprenticeships Team. If it cannot be resolved at this first stage, it will be passed to the University Dean: Student Education (Quality and Standards).

Apprenticeships Team, University of Leeds

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Approved by the Quality and Standards Committee – 16 May 2024

⁶ See University of Leeds Human Resources policies (internal access):
<https://leeds365.sharepoint.com/sites/HumanResources/SitePages/Conduct,-Cap.aspx>



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Integrated Degree Apprenticeship programmes

CONFLICT OF INTEREST DECLARATION FORM FOR INDEPENDENT ASSESSORS OR EPA EXTERNAL EXAMINERS

Guidance

1. You must read the Conflict of Interest Policy for Independent Assessors/External Examiner on End Point Assessments before completing the form.
2. Please complete either table 1 *or* table 2 (below) to record any actual, potential or perceived conflicts of interest you may have, or to declare that you have no conflicts of interest, in relation to acting as an Independent Assessor or External Examiner for End Point Assessment.
3. Please update these records as necessary for each EPA period that you undertake.
4. If any new potential conflicts of interest arise between EPA periods, these should be declared to the [Apprenticeships Team](#) and Apprenticeship Programme Manager when they occur.
5. All documents will be held by the Apprenticeships Team and in compliance with the Data Protection Act 2018.
6. We may also be required to share personal information with our external regulators and auditors in accordance with the University of Leeds Staff privacy Notice⁷. In all cases the personal data shared will only be that which is necessary and subject to the University having measures in place to ensure data is handled in line with data protection laws.

Table 1: No Conflict of Interest

Name of Independent Assessor/ External Examiner <i>(delete as appropriate)</i>	
Apprenticeship Programme title	
Apprenticeship Standard and version	
'NO INTEREST' DECLARATION	I confirm that I have been provided with the names of the apprentices taking End Point Assessment in[provide date/cohort reference] and the names of their employers.
	I confirm that neither I nor my family members have any conflicts of interest which could compromise delivery of End Point Assessment.
Signed:	
Date:	

⁷ <https://dataprotection.leeds.ac.uk/gdpr/staff-privacy-notice/>



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Table 2: Declaration of Interest

Name of Independent Assessor/ External Examiner <i>(delete as appropriate)</i>	
Apprenticeship Programme title	
Apprenticeship Standard and version	
DECLARATION OF INTEREST	I confirm that I have been provided with the names of the apprentices taking End Point Assessment in[provide date/cohort reference] and the names of their employers.
	I set out my (or my family members') potential, actual or perceived interests below, in accordance with the University of Leeds Conflict of Interest Policy for Independent Assessors and EPA External Examiner which could compromise delivery of End Point Assessment on integrated Degree Apprenticeships.
1.	
2.	
3.	
4.	
5.	(add more rows as required)
Signed:	
Date:	

To be completed by the University:

Action to be taken by the University of Leeds (select one)	No conflict: No action required	
	Conflict: Appoint another Independent Assessor or EPA External Examiner	
	Conflict: Mitigating Action (see below)	
Mitigating action		
1.		
2.		
3.		
4.		
5.		
Individual(s) responsible for monitoring the mitigation:		
Name:		
Signed:		
Date:		