



AIMASSESSMENT

Policies

For apprentices, employers,
and training providers



Conflict of interest

December 2023

Document version history

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Introduction

The purpose of this document is to provide guidelines and information on potential situations where conflicts of interest may arise, identify the principles that AIM will adopt in the management of conflicts of interest, set out what actions should be taken by individuals who encounter conflicts of interest and set out how we will manage identified conflicts of interest.

This policy and related procedures are intended for:

- All individuals serving as EPA associates for AIM Qualifications and Assessment Group. Associates (definition can be found in section 1)
- AIM Qualifications and Assessment Group Associates include Associate Assessors, Internal Quality Assurers, and End-Point-Assessment developers.
- AIM Qualifications and Assessment Group staff
- All employers, training providers and apprentices who complete EPA with AIM

About us

AIM Qualifications and Assessment Group is a leading Awarding Organisation and one of the UK's largest Access Validating Agencies (AVA). We work in partnership with colleges, independent training providers, universities, employers, and voluntary organisations to develop accredited and regulated vocational qualifications. As an AVA we are licensed by the Quality Assurance Agency (QAA) to develop and award nationally recognised Access to Higher Education Diplomas. AIM Qualifications and Assessment Group is also an independent, government recognised, End-Point Assessment Organisation (EPAO) responsible for an apprentice's final assessment to ensure they can do the job for which they've trained. Our apprenticeship standards range from Level 3 to 7, and focus on the creative, cultural, and business industries.

About this policy

Definitions of conflict of interest

Associate An individual assigned by AIM Qualifications and Assessment Group to assess learner performance or develop assessment materials in standards assessed externally.

Conflict of Interest A conflict of interest is where an individual or organisation has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances and it is likely that people working with or for us may encounter potential conflicts of interest from time to time.

Examples include:

- where someone has a position of authority in one organisation which conflicts with their interests in another organisation
- where someone has personal interests that conflict with their professional position
- where someone works for us or carries out work on our behalf, but who may have paid or unpaid personal interests in another business which uses our products or services or produces similar products
- where someone works for or carries out work on our behalf who has friends or relatives taking our assessments or examinations
- where there is a conflict between income and regulatory responsibilities
- where training and delivery and awarding rest within one umbrella organisation
- where AIM's end-point assessment organisation activity, or activity undertaken on its behalf, has the potential to lead it to act contrary to the EPA framework
- when one part of AIM creates and follows a procedure that conflicts with its regulatory responsibilities as an end-point assessment organisation

It is the responsibility of all staff at AIM, employers, training providers and apprentices to ensure that they are familiar with this conflict of interest policy and the requirement to disclose any activity that has the potential to represent a conflict of interest.

Identifying conflict of interest in the end-point assessment of apprentices

The following guidance is provided regarding the management of conflict of interest in the assessment of end-point assessments:

1. We will take all reasonable steps to avoid any part of the assessment of an apprentice's work being undertaken by any person who has a personal interest in the result of the assessment.
2. Upon contracting, associate assessors will be asked to disclose all other employment/contractual relationships, for example with training providers, employers.
3. At the point of allocating an apprentice to an assessor/IQA/invigilator the system checks for any conflicts and will not allocate an apprentice to someone with a declared conflict.
4. In any event that an apprentice, employer, training provider, assessor, invigilator or IQA identifies a conflict of interest, the parties involved need to inform us immediately by completing and submitting the **conflict of interest declaration form** ([available on the AIM Assessment website](#)) via email to assessment@aim-group.org.uk.
5. In the event that the conflict of interest is identified after an assessment has taken place the parties involved need to inform us immediately by completing and submitting the **conflict of interest: change in circumstance form** ([available on the AIM Assessment website](#)) via email to assessment@aim-group.org.uk.
6. We will take all reasonable steps to avoid any part of the assessment development or delivery of an apprentice being undertaken by any person who has a personal interest in the result of the assessment. In any event that a staff member identifies a conflict of interest, the parties involved need to inform us immediately by completing and submitting the **conflict of interest declaration form** ([available on the AIM Assessment website](#)).

Disclosure of conflict of interest

Prior to training in the role of an associate, individuals must disclose any potential conflicts of interest to the EPA team. This includes any affiliations, financial interests, or personal relationships that may affect their ability to conduct an unbiased evaluation.

Actual, potential, or perceived conflicts of interest could arise from any of the following, the list is not exhaustive:

- previous or current employment at an employer delivering an associated EPA standard.
- employment at a training provider that contracts AIM for end point assessment services or qualifications.
- appointment to a board, committee, tribunal panel etc of AIM or an AIM centre.
- membership of a professional body with an interest in the development, delivery, or award of apprenticeships.
- contractual or personal relationship with AIM or their staff, e.g., consultants or other associates.
- contractual or personal relationship with an employee whose employer is an AIM centre or contracts AIM for end point assessment services.
- personal or professional relationship with a candidate who is undertaking an AIM qualification or end point assessment.
- Individual is a governor for an AIM Qualifications and Assessment Group approved school, college, or training provider.

All declarations of conflict of interest will be logged.

Declarations will be considered by the end-point assessor manager and one of the following possible outcomes will be agreed:

- **Approved** – the staff member is approved to assess and/or invigilate/quality assure the assessment
- **Referred** – further information is required to demonstrate suitability
- **Approved with actions** – further appropriate steps agreed to have the invigilation or assessment second assessed or moderated by another person
- **Declined** – the associate has a conflict of interest that cannot be managed appropriately and therefore no work relating to that conflict can be carried out

If a declaration has been made after the assessment has taken place, the end-point assessor manager and the EPA delivery manager will agree an appropriate course of action to ensure that all affected apprentices' assessed work is subject to additional levels of scrutiny. In the event of adverse effect, this would be passed to the compliance team for processing.

Appeals

Once a decision has been made you will be informed. If you wish to appeal against the decision made, more information can be found within the AIM Results and appeals policy which can be found on our website.

Confidentiality

All conflicts of interest disclosures submitted by associates will be treated with the utmost confidentiality. Only authorised personnel directly involved in the assessment development/review process will have access to this information.

Associates are expected to maintain confidentiality about their involvement in the assessment development/review process to avoid potential biases or perceptions of bias.

Impartiality and Objectivity

Associates must approach their role with complete impartiality and objectivity. They must not favour any apprentice standard or show bias based on personal beliefs, affiliations, or other factors.

Associates must adhere to the established assessment guidelines provided by AIM Qualifications and Assessment Group.

Recusal

If an associate becomes aware of a conflict of interest after being assigned to an assessment development/review, they must immediately notify AIM Qualifications and Assessment Group and recuse themselves from the process.

In such cases, a replacement associate will be appointed, ensuring an unbiased evaluation of apprentices and standards.

Training and Awareness

AIM Qualifications and Assessment Group will provide training and resources to associates to enhance their understanding of conflicts of interest and the importance of impartiality in the assessment development/review process.

How AIM staff implement the policy

Corporate conflict of interest

Corporate conflict of interest resolution lies principally with the board of trustees and the executive group (EG). Corporate conflict of interest includes the balance between maintaining financial stability and compliance with regulation, for example the types of centres we work with or engaging in activities which require resources or expertise we cannot supply. Trustees have a responsibility to ensure AIM meets its mission and is financially viable alongside a responsibility to ensure we are compliant with our regulators. **The Board of Trustees and the EG must balance these conflicts by:**

- recognising and recording where and when they occur
- making transparent decisions about the resolution of such conflicts

Conflict of interest in confidential assessments

Contracts of employment for all associates require all to maintain confidentiality whilst in and after employment.

All staff and associates involved in the creation, assessment and moderation of external assessments **must follow the following instructions:**

1. You must complete security and confidentiality of material at all times.
2. The requirement **extends to a period of two years** following termination
3. Any information or materials that assessment developers/reviewers have access to as a result of work carried out on behalf of AIM at an external organisation must be kept confidential at all times, for an indefinite period.

Conditions and licencing criteria

This policy is intended to meet the regulatory requirements of Ofqual

Section	Condition/Licensing criteria
Conflicts of interest	Condition A4
Identification and management of risk	Condition A6
Malpractice and maladministration	Condition A8
Cooperation with regulators Arrangements with centres	Condition B6
Arrangements with centres	Condition C2
Maintaining confidentiality of assessment materials	Condition G4
Appeals process	Condition I1
Compliance with regulator's appeals and complaints process	Condition I2

The following provides contact details for AIM Qualifications and Assessment Group and its regulators

AIM Qualifications and Assessment Group Contact details

If you have any queries about the contents of the policy, please contact our End-Point Assessment Director

Telephone: **01332 224654**

Email: debbie.tuisawau@aimgroup.org.uk

Ofqual

Telephone: **0300 303 3344**

Email: public.enquiries@ofqual.gov.uk



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