

Responsibility:	Director of Quality and Compliance	Date doc. created:	March 2021
Print name sign off:	Chris Garcia	Last review date of doc:	April 2026
Signature:	Chris Garcia	Next review date:	March 2027

Owner and version control

BPN Conflict of Interest Policy

1. Purpose

This policy sets out how Best Practice Network (BPN) identifies, declares, records, manages, and monitors conflicts of interest (COI) to ensure the integrity, fairness, and credibility of all services, including End-Point Assessment (EPA) and apprenticeship delivery.

BPN is committed to preventing any actual, potential, or perceived conflicts of interest from adversely affecting assessment decisions, quality assurance, or stakeholder trust.

2. Scope

This policy applies to all individuals and organisations involved in BPN activities, including:

- Employees and Senior Leadership Team (SLT)
- Assessors, tutors, and IQAs
- Associates and contractors
- Advisory board and panel members
- Employers, training providers, and apprentices
- EPAO partners and third-party organisations

3. Definitions

A conflict of interest arises where an individual's or organisation's judgement or actions could be influenced by competing interests.

Conflicts may be:

- **Actual:** A direct conflict exists
- **Potential:** A conflict could arise in the future

- **Perceived:** A situation could reasonably be seen as a conflict by others

Conflicts may also be financial or non-financial and personal or organisational.

4. Roles and Responsibilities

4.1 Director of Quality and Compliance

- Owns this policy and ensures implementation
- Oversees the conflict of interest register
- Ensures compliance with regulatory requirements

4.2 Managers and Responsible Officers

- Review and approve declarations
- Assess risk and agree mitigation actions
- Escalate high-risk conflicts to SLT

4.3 Staff, Assessors, and Associates

- Declare all actual, potential, or perceived conflicts
- Update declarations when circumstances change
- Comply with agreed mitigation measures

4.4 Partners and Third Parties

- Adhere to this policy as part of contractual obligations
 - Ensure staff are aware of and comply with requirements
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5. Types of Conflict of Interest

Conflicts may include, but are not limited to:

- Personal relationships with apprentices, employers, or providers
 - Financial interests in partner organisations
 - Employment or work with competing organisations
 - Prior involvement in training or assessment of a learner
 - Reciprocal arrangements with other organisations
 - Roles that compromise independence between training and assessment
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6. Declaration Requirements

All individuals must declare conflicts of interest:

- At onboarding or engagement
- Annually
- As soon as a new conflict arises

Declarations must be submitted using the Conflict of Interest Form and recorded in the central register.

7. Assessment and Management of Conflicts

7.1 Process

1. Declaration submitted
2. Manager review and risk assessment
3. Decision on mitigation
4. Recording in central register
5. Ongoing monitoring and review

7.2 Mitigation Measures

Actions may include:

- Reassigning assessments
 - Removing individuals from activities
 - Increasing monitoring or sampling
 - Appointing independent assessors
 - Adjusting roles or responsibilities
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8. Safeguarding Independence

BPN will ensure:

- Clear separation between training delivery and assessment
 - No assessor evaluates learners they have trained or managed
 - Independent decision-making in EPA activities
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9. Monitoring and Review

- All conflicts are recorded in a central register
- High-risk conflicts are monitored regularly
- Annual review of all declarations

- Quarterly review of resolved conflicts where appropriate
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10. Breaches and Escalation

Failure to declare or manage a conflict of interest may result in:

- Removal from duties
- Reassignment of work
- Disciplinary action
- Contractual action for partners
- Investigation under malpractice or maladministration procedures

All breaches will be investigated and documented.

11. Record Keeping

BPN will:

- Maintain a secure central conflict of interest register
 - Retain records in line with data protection requirements
 - Ensure records are available for audit and quality assurance
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12. Related Policies

This policy should be read alongside:

- Malpractice and Maladministration Policy
 - Whistleblowing Policy
 - Equality and Diversity Policy
 - Safeguarding Policy
 - Recruitment Policy
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13. Contact

For queries relating to this policy:

Email: chrisgarcia@bestpracticenetwork.co.uk

Appendix A: Conflict of Interest Declaration Form

Conflict of Interest - Disclosure Form

Assessment-In-Confidence (When completed)

Name	
Position (please tick)	<input type="checkbox"/> Programme Board and SLT <input type="checkbox"/> End-point assessors undertaking end-point assessment activities. <input type="checkbox"/> Associates acting in the capacity as EPA or IQA or Apprenticeship Tutor <input type="checkbox"/> Qualification design team (those designing the EPA or programme tools) <input type="checkbox"/> The EPA or Apprenticeship delivery team (admin, finance etc) <input type="checkbox"/> Stakeholders, including employers, providers, and apprentices. <input type="checkbox"/> Programme Board and sub committees <input type="checkbox"/> BPN panel members such as appeals, complaints, sanctions, and malpractice. <input type="checkbox"/> Partner organisations to include Awarding Organisations/External Quality Assures (EQAs) and certification bodies. <input type="checkbox"/> Other. Please Specify _____
Location	
Organisation (if applicable)	
Conflict of Interest or potential conflict of interest	
<p><i>Describe the conflict of interest or potential conflict of interest that have the potential to impact on your ability to carry out, or be seen to carry out, your allocated role or your organisation's role with regards to the Best Practice Network Apprenticeship End Point Assessment Conflict of Interest Policy.</i></p>	
Describe the expected roles/duties you are required to perform.	

Declaration of Compliance with BPN Conflicts of Interest Policy:

Acknowledgement of Policy & Training

I confirm that I have read, understood, and complied with the **Best Practice Network (BPN) Policy on Conflicts of Interest**.

I further confirm that **conflict of interest training** was provided as part of my induction.

Accuracy of Disclosed Interests

I declare that the details provided regarding my private interests (or my organisation's interests) are **accurate and complete** to the best of my knowledge.

Ongoing Responsibilities

I am aware of my obligation to:

- Take reasonable steps to avoid **real or perceived conflicts of interest** in connection with my employment (or my organisation's engagement).
- Promptly notify **Best Practice Network** of any material changes in my personal or professional circumstances that may affect this declaration.

Signature:
Date:

Action by Manager

Describe the action proposed to mitigate the real or perceived conflict which has been disclosed and the reasons for the decisions

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The above action has been discussed with the employee and is appropriate to resolve the real or apparent conflict of interest disclosed above.

Signature of Manager:

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Date:

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Employee Endorsement:

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Date:

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When finalised this form is to be forwarded by email with subject header "Conflict of Interest" to chrisgarcia@bestpracticenetwork.co.uk . You are advised to retain a copy.