

# Conflicts of Interest Policy

CIRO Apprenticeship Assessment Organisation

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# 1. Purpose

This policy sets out the approach of Chartered Institution of Railway Operators (CIRO) to the identification, declaration, management and monitoring of conflicts of interest in relation to apprenticeship assessment activities. It is designed to safeguard the independence, objectivity and credibility of assessment decisions and to maintain public confidence in the integrity of CIRO's assessment services.

The purpose of this policy is to ensure that all actual, potential and perceived conflicts of interest (COI) are identified promptly, recorded appropriately and managed effectively. Where necessary, arrangements will be put in place to prevent conflicts from adversely affecting the design, delivery, marking, moderation, quality assurance or certification of apprenticeship assessments. In doing so, CIRO seeks to protect the validity, reliability and fairness of assessment outcomes.

This policy applies to all apprenticeship assessment activities delivered by CIRO and covers:

- Individuals involved in assessment activities involved in administration and assessment activity, including assessors, invigilators, Internal Quality Assurers (IQAs), External Quality Assurers (where applicable), contractors and subject matter experts
- Members of committees, panels and governance structures with oversight of apprenticeship assessment
- Any individual or organisation with a financial, professional or personal interest that could influence, or be perceived to influence, assessment decisions
- All stages of the assessment lifecycle, including design, development, delivery, marking, grading, moderation, appeals and certification

This policy has been developed with reference to:

- Ofqual's General Conditions of Recognition, including Condition A4 (Conflicts of Interest)
- Skills England requirements for organisations delivering apprenticeship assessment
- The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)

Through this policy, CIRO commits to maintaining transparent and robust arrangements for the declaration and management of conflicts of interest, ensuring that all apprenticeship assessment activities remain impartial, compliant and defensible.

# 2. Principles

CIRO's EPAO applies the following principles when identifying, declaring and managing conflicts of interest in apprenticeship assessment:

- **Independence** – Assessment decisions must be made free from undue influence or bias.

- **Objectivity** – All individuals involved in assessment activities must act impartially and base decisions solely on evidence and assessment criteria.
- **Transparency** – Policies, procedures and any declarations of interest are clearly communicated to all individuals involved in assessment activities and relevant stakeholders.
- **Proportionality** – Actions to manage conflicts must be appropriate, practicable, and targeted to the level of risk posed.
- **Consistency** – Conflicts are identified and managed in a consistent manner across all assessment activities and in line with Ofqual and Skills England requirements.
- **Accountability** – Individuals involved in assessment activities are responsible for declaring interests promptly. CIRO is responsible for carrying out proportionate conflict checks, considering information disclosed by apprentices and other parties, and ensuring that identified conflicts are assessed, recorded and managed before the assessment proceeds.

This framework ensures that all apprenticeship assessment activity remains fair, reliable and defensible while maintaining confidence in CIRO's processes.

### 3. Definitions

- **Conflict of Interest (COI)** – Any situation in which an individual's personal, financial, professional, or relational interests could, or could be perceived to, influence their judgement in assessment activities.
- **Actual COI** – A direct conflict that is currently affecting or could affect assessment decisions.
- **Potential COI** – A situation where a conflict could arise in the future if certain circumstances occur.
- **Perceived COI** – A situation that could reasonably be perceived by others as influencing impartiality, even if no actual bias exists.

### 4. Examples

Examples of conflicts of interest may include, but are not limited to:

- Prior training, coaching, mentoring or assessment
- Employment of contractual relationship with an employer involved in the assessment
- Employment of contractual relationship with a training provider involved in the assessment
- Personal relationship (family, partner, close friend)
- Financial or commercial interest

For clarity on whether a situation constitutes a conflict of interest, individuals involved in assessment activities should contact the CIRO team for guidance.

## 5. Declaration of Interest

- First Conflict of interest checks form part of the assessment allocation and scheduling process.
- All parties immediately prior to the assessment starting are required to confirm they believe there is no COI.
- All individuals involved in assessment activities must declare any actual, potential or perceived conflicts of interest before engaging in an assessment activity. Apprentices must also disclose any known personal, professional or financial relationship with an assessor, invigilator or other individual involved in their assessment that could affect, or reasonably be perceived to affect, impartiality.
- Declarations should be submitted using Form F016 Conflict of Interest Disclosure Form (Appendix 1)
- Declarations must be updated promptly if circumstances change.
- Conflicts of Interest are assessed on a risk-based approach to ensure proportionate and appropriate management and are escalated to the appropriate person within the EPA team.
- All Conflicts of Interest must be declared prior to involvement in any assessment activity, and at the latest before the assessment is conducted.
- Conflicts identified after an assessment must be declared immediately for review and escalated to the EPA Supervisor/ Head of EPA.
- CIRO will review and respond to all declared Conflicts of Interest, ensuring appropriate action is taken and recorded for audit purposes prior to an EPA.
- Failure to declare a conflict of interest may be treated as maladministration or malpractice and will be investigated in line with CIRO's Malpractice and Maladministration Policy.

## 6. Decision-Making and Management Process

CIRO manages conflicts of interest through a structured process:

1. **Assessment of Risk** – Evaluate the likelihood and potential impact of the conflict on assessment integrity. (e.g.High, Medium, Low.)
2. **Mitigation Actions** – May include reallocation of responsibilities, additional oversight, or recusal from specific decisions.
3. **Documentation** – Record the conflict, assessment of risk, and agreed actions.
4. **Review** – Periodic review to ensure mitigation remains effective.

## 7. Implementation

- Managers are responsible for ensuring that all individuals involved in assessment activities receive appropriate training and understand the COI procedures relevant to their roles.
- Individuals involved in assessment activities are responsible for declaring conflicts in a timely manner and cooperating with mitigation measures.
- Oversight bodies (Management, Quality and Compliance Group, Responsible Officer, SAM and Ofqual) monitor compliance, investigate breaches, and take corrective action where necessary.

## 8. Storage and Record-Keeping

- All COI declarations, risk assessments, and mitigation actions must be securely stored for audit purposes.
- Records must be retained in line with organisational record retention policy and Ofqual/Skills England requirements.
- Access to records is restricted to authorised personnel only.

## 9. Monitoring and Review

- Regular audits of COI records and processes will be conducted to ensure effectiveness.
- Conflicts of interest are a standard agenda item at the Quality and Compliance Group meetings to ensure ongoing monitoring, review of declarations, and management of any emerging risks.
- The policy will be reviewed at least annually, or sooner if legislative, regulatory, or operational requirements change.

|                            |                                                                                       |
|----------------------------|---------------------------------------------------------------------------------------|
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| <b>Signature</b>           |  |

## 8 Appendix

### Appendix 1 – Conflict of Interest Disclosure Form

COI's should be declared using the following form:

[F016 Conflict of Interest Disclosure Form - CIRRO Apprenticeship Assessment V2 – Fill in form](#)

### Appendix 2 - Conflict of Interest Risk Rating Guidance

All Conflicts of Interest must be declared and supported by completion of a Conflict-of-Interest Disclosure Form, regardless of whether the conflict is assessed as low, medium, or high risk.

#### Low Risk

The conflict is remote, historic, or unlikely to influence assessment decisions. Appropriate controls can be implemented with minimal impact on assessment delivery.

Examples:

- Previous professional contact with the employer but no direct involvement with the apprentice.
- Employment with the employer or training provider ended more than 2 years ago.
- Prior involvement in assessment material development where no access to live assessment content exists.
- Membership of an industry group or professional body associated with the employer or provider.

Typical Action:

- Record the conflict.
- Proceed with assessment activity / swap of personnel involved in assessment
- Additional monitoring if considered necessary.

#### Medium Risk

The conflict could reasonably be perceived as affecting impartiality or has the potential to influence assessment decisions if not appropriately managed.

Examples:

- Previous training, coaching, mentoring, or assessment of the apprentice during their apprenticeship.

- Recent employment or contractual relationship with the employer or training provider (within the last 2 years).
- Previous working relationship with the apprentice.
- Involvement in developing assessment materials that are currently in use.
- Close professional relationship with key employer or provider personnel.

**Typical Action:**

- Record the conflict.
- Reassignment should normally take place. Where reassignment is not possible, the rationale must be documented and appropriate mitigation measures implemented, such as enhanced oversight, IQA sampling, or independent review.
- Apply additional oversight, IQA sampling, or monitoring.
- Decision approved by EPA Supervisor or Head of EPA.

**High Risk**

The conflict presents a significant risk to impartiality, assessment validity, or public confidence and cannot be adequately mitigated through additional oversight alone.

**Examples:**

- Family member, partner, or close friend being assessed.
- Current line manager, colleague, or direct report of the apprentice.
- Current employment or financial interest directly linked to the apprentice's assessment outcome.
- Individual has provided substantial training, coaching, or preparation specifically for the EPA being assessed.
- Any situation where an independent observer could reasonably conclude that impartiality has been compromised.

**Typical Action:**

- Individual must not participate in the assessment activity.
- Assessment responsibilities reallocated.
- Escalation to Head of EPA.

All Conflict-of-Interest Disclosures must be submitted prior to involvement in any assessment activity and, at the latest, before the assessment is conducted.