

Institute of Couriers

Conflict of Interest policy

Purpose of the policy

The aim of this policy is to give guidance to directors, employees and anybody acting on its behalf on how the Institute of Couriers (IOC) handles conflicts of interest, and the action it takes to prevent and manage such conflicts of interest from occurring. This policy is in place to ensure we address all conflicts of interest irrespective of how or where they arise.

It is IOC's aim that directors, employees and others acting on IOC's behalf should be free from conflicts of interest or potential conflicts of interest which could adversely influence their judgment or objectivity when conducting IOC activities.

The company recognises that directors, employees and others acting on IOC's behalf may take part in legitimate financial, business, charitable and other activities outside IOC. However, directors, employees, sub-contractors and others acting on IOC's behalf should avoid actions, situations or relationships which might conflict, or appear to conflict, with their responsibilities on behalf of IOC, or that might conflict, or appear to conflict, with the interests of IOC.

IOC has been approved as a member of the IFATE Directory of professional and employer-led bodies. This brings specific responsibilities in relation to Conflicts of Interest. **Annex A** to this policy details the arrangements and processes we have put in place that cover the deployment of industry experts by IOC to support apprenticeship external quality assurance activity (EQA) activities.

Potential conflicts of interest

The following are some (but not exclusive) examples of potential conflicts of interest that could apply to IOC directors, employees and sub-contractors acting on its behalf:

- having a direct or indirect financial interest in an IOC competitor, supplier or customer
- using IOC confidential information for personal gain or advantage
- having a directorship, other employment or consulting relationship which could affect that person's ability to satisfactorily perform IOC duties and obligations

Disclosure of conflicts and potential conflicts of interest

It is the responsibility of all directors, employees, and others acting on IOC's behalf, to disclose any conflict of interest, or potential conflict of interest, promptly to IOC's Chief Executive.

All directors, employees, and others acting on behalf of IOC, are encouraged to discuss any financial, business, charitable or other activities which may pose any conflict of interest, or

potential conflict of interest with IOC's Chief Executive prior to taking part in such activity and where appropriate seek the written approval of the Chief Executive.

All IOC employees and sub-contractors acting on behalf of IOC, are required to complete a **Conflict of Interest Disclosure Declaration**, and they are responsible for disclosing any conflict of interest, or potential conflict of interest, that may occur thereafter, promptly to IOC's Chief Executive.

The Conflict of Interest Disclosure Declaration will be held on file in accordance with the Rehabilitation of Offenders Act 1974, the Data Protection Act 1998 and General Data Protection Regulation (GDPR) 2016.

IOC 2021

ANNEX A

IFATE Directory of professional and employer-led bodies

This annex to the Institute of Couriers (IOC) Conflict of Interest policy sets out the specific roles and responsibilities of participants in EQA activity and the processes that IOC follow to:

1. Identify actual or potential conflicts of interest before carrying out any EQA activity
2. Mitigate against adverse effects of potential conflicts of interest where they arise

For the purpose of this document this involves:

- An actual conflict: a conflict (financial or otherwise) which has materialised between a IOC's (or individual's) EQA duties and their other interests.
- A potential (or perceived) conflict: where an actual conflict is foreseeable but not certain (and not yet actual).

A conflict of interest arises when an organisation / individual finds themselves in a situation where the potential for personal gain, or the presence of a personal, professional or financial relationship results in the risk their EQA judgements and actions lack robustness and consistency due to lack of objectivity.

Both organisations and individuals could have a conflict of interest. Organisations and/or individuals will be excluded from EQA activity where identified conflicts are material and cannot be mitigated.

The Institute of Apprenticeships and Technical Education expects any change in an organisation's or individual's position to be disclosed as soon as reasonably possible. This responsibility is ongoing and will be assessed by IOC at a minimum on initial application and on receipt of each commission for EQA activity.

Detailed information on conflict of interest is available on the Institute's [website](#).

IOC confirms that:

1. When applying to join the directory of professional and employer-led bodies, IOC will declare on the application form:

- a. any existing or potential **organisational** conflicts. These could include but are not limited to:
 - i) being registered to deliver end-point assessment (EPA) for any of the standards listed in the application
 - ii) being registered as an apprenticeship training provider for any of

- the standards listed in the application
- iii) being associated with another organisation that offers apprenticeship training or end-point assessment
- b. any existing or potential **individual** conflicts for the experts it intends to use for this work. These could include but are not limited to:
- i) having a financial or other personal interest in the outcome of the external quality assurance (EQA) activity for a particular apprenticeship
 - ii) working for an organisation providing EPA services for a particular standard
 - iii) receiving any kind of monetary payment, non-monetary gift or incentive (including hospitality) from any organisation due to have EQA activity carried out
 - iv) canvassing, or negotiating with any person with a view to entering into any of the arrangements outlined above
 - v) having a member of their family (including unmarried partners) who fall into any of the categories outlined above
 - vi) being involved in the development of the standard
 - vii) being employed by an end-point assessment organisation's (EPAO's) competitor
 - viii) teaching on a course created by another EPAO or an awarding organisation
 - ix) having connections with assessors carrying out EPA for a particular standard
 - x) any personal, professional or financial connection with an apprentice who is currently in training with any of the training providers that are due to have EQA activity carried out
- c. how it plans to mitigate any potential or actual organisation conflict. These plans could include but are not limited to:
- i) not carrying out EQA activity on specific standards
 - ii) utilising experts from its membership base rather than employed staff who may have a conflict
 - iii) removing specific individuals from EQA support activity where there is an actual and ongoing conflict

2. When putting forward individual experts to conduct EQA activity, the IOC will:

- a. ensure experts are made aware of the conflict-of-interest obligations
- b. discuss any actual or potential conflicts with the individual and identify any actions or recommendations to remedy the conflict
- c. identify, record and disclose any remaining actual or potential conflicts to the Institute for Apprenticeships and Technical Education (IfATE), Ofqual or the Office for Students as appropriate
- d. set out the mitigations it proposes to deal with the remaining conflict, for example:
 - individuals will not be engaged in EQA activity involving a particular training provider or apprentice where they have disclosed conflicts of interest from connections with that training provider or apprentice
 - individuals will not be engaged in EQA activity involving a particular EPAO or assessor where they have disclosed conflicts of interest from connections with that EPAO or assessor
 - individuals will not be engaged in EQA activity relating to the EPA Plan where they have disclosed any conflicts of interest due to connections with the Trailblazer Group that created the EPA Plan

3. For the duration of its time as a member of the Directory, the IOC will disclose any organisational or individual conflicts of interest or related changes that arise as soon as reasonably possible.