



Conflict of Interest Management Policy

Introduction

The Engineering Industry Training Board (ECITB) is a statutory Industry Training Board established in 1991 out of the old Engineering Industry Training Board (EITB). It has operated an Awarding Organisation (AO) since its inception. The Awarding Organisation has always been an integral part of the ECITB and has never been a stand-alone organisation. As such it utilises a number of shared support services including:

- Finance and Accounts
- Human Resources
- Policy & Corporate Affairs
- Research and Development

ECITB staff and personnel involved in the accreditation of qualifications, registration and certification of learners, quality assurance of delivery, approval monitoring and management of Approved Centres and all customer services, are aware of:

- the requirement and importance of reporting any potential conflict of interest, their own and others;
- the regulatory requirement for the effective managing of conflicts of interest and;
- the contents of this policy.

ECITB Organisation Infrastructure

The Awarding Organisation forms part of the ECITB's Development and Quality Directorate. The Responsible Officer reports directly to the Director who, in turn, reports directly to the ECITB CEO. The Directorate does have other responsibilities outside of the Awarding Organisation in relation to the setting and monitoring of quality and operating standards for ECITB products and services; quality and process related administrative services to other internal departments; research and development; quality systems; and staff development. The Directorate is not responsible for Apprenticeship certification services.

A number of functions are shared across the ECITB. However, no member of the Awarding Organisation or the Development and Quality Directorate is involved in the delivery of ECITB training programmes. The ECITB itself is not a direct training provider. Its programmes are delivered through a network of independent training providers, employer training departments and colleges who are licensed by the ECITB for specific programmes. The management of these supply chains and for ensuring the delivery of set standards is the responsibility of the Directorate but separate from the activities of the Awarding Organisation.

As an ITB the ECITB also collects a statutory levy and pays grants to in-scope employers for a variety of programmes and achievements, including qualifications. The setting and

payment of grants is the responsibility of the Regional Operations and Finance & Administration Directorates and the Awarding Organisation has no input. While the Director of Development and Quality does have an input, it is limited to the financial management of the organisation and not in determining levels of grants for qualifications.

Conflict of Interest and Management

As a result of the infrastructure discussed above the ECITB does consider that, potentially, there is a risk of conflict of interest, but it considers this risk to be low to medium and manageable.

The potential risk is managed and mitigated against by the following:

- A separate governing body for the Awarding Organisation whose primary purpose is to oversee regulatory compliance. The Chair is a member of the ECITB Board to which the governing body is accountable.
- The Responsible Officer and Development & Quality Director understand the potential for conflict of interest and the regulatory requirement for these to be managed / mitigated against. The potential for any conflict of interest is taken into account as a routine part of normal business activities. All necessary actions are undertaken to minimise the risk. This may sometimes mean the Director deferring certain decisions or actions for other aspects of his role to fellow Directors, or getting the Heads of Functions to act on his behalf.
- The Awarding Organisation treats all of its Approved Centres the same; those that are levy paying companies are treated no differently and all Awarding Organisation fees and charges are applied equally.
- No individual employed by the ECITB is involved in the assessment of learners or the application of internal quality assurance processes and procedures. External quality assurance is carried out by a mix of employees and External Quality Assurers who are not employed directly by the ECITB, but are contracted on service agreements. They are required to make a declaration of any potential conflicts of interest with their work for ECITB. They are then allocated Approved Centres accordingly. Should a situation change and a conflict of interest or potential conflict emerge the Approved Centre is allocated a replacement External Quality Assurer.
- Where appropriate the Awarding Organisation ensures that assessors and internal verifiers are not directly involved in the delivery of training for learners for whom they have assessment and moderation responsibility for. Full marking sheets are required where a Centre is allowed to mark and grade an assessment and these are subject to both internal and external quality assurance.

The ECITB will continue to implement its Risk Management System and Conflict of Interest will feature on the Register. The risk will be constantly reviewed and managed.

The ECITB is confident that no Adverse Events will occur as a result of the current ECITB structures and operating principles.

Scope

This policy covers potential conflict of interest, both from the infrastructure of the ECITB, as discussed above, and from the activities of individuals, third parties and Approved Centres

engaged in the development, delivery and award of qualifications, including the assessment of learners.

Approved Centres' Responsibility

Approved Centres should take all reasonable steps to ensure that their staff involved in the management, assessment and quality assurance of our qualifications, and their learners, are aware of the contents of this policy and that the Approved Centre has a conflict of interest policy and procedure in place to manage any potential conflict of interest arising from the Centre.

Approved Centre personnel must declare any secondary interest that is relevant and material, personal or business which may conflict with their primary interest, their duties and responsibilities. These could include, but not exclusively, direct or indirect financial interest, close family members, persons related or living in the same household, a firm, business or organisation with which a person is connected.

No gifts or hospitality, unless trivial or of low monetary value, should be accepted.

Any potential conflicts identified should be managed by a written procedure.

Review Arrangements

We will review this policy and its associated procedures as part of our continuous improvement arrangements and revise it, as and when necessary, in response to customer, learner or regulatory feedback (e.g. to align with any enquiries process established by the regulators) and to identify any trends that may emerge in the subject matter of enquiries received.

Contact us

If you have any queries about any aspect of this process, please contact:

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