



Conflict of Interest Policy

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IAMI Directors	Ver 3	Nov 2023	Mar 2026	Secretary, IAM I

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1. Introduction

- 1.1 This policy applies to all Directors, Officials and employees of the International Association of Maritime Institutions – henceforth known as IAMI.
- 1.2 This policy will also to protect the interests of the apprentices taking the End Point Assessments (EPA) provided by IAMI and to protect the integrity of the IAMI as the provider of these assessment.
- 1.3 The policy will enable IAMI, to identify, manage and mitigate any conflicts of interest, both actual and perceived, during the arrangement, assessment and audit of the EPA elements.
- 1.4 The policy will be provided to all organisations that engage IAMI to undertake EPA's of their apprentices.

2. Scope of policy

This policy applies to:

- 2.1 All persons from either the contacting organisation (e.g. employer or training provider) or IAMI employee involved in the arrangement, assessment and audit of the EPA elements.
- 2.2 Any external persons involved with either the employer, training provider or IAMI where there is potential for conflicts of interest with IAMI as a provider of the EPA.

3. Definition of conflict of interest

- 3.1 A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. There is a risk that any conflict of interest may adversely affect their judgement or influence their objectivity when making decisions if it is not properly identified or managed.
- 3.2 Conflicts of interest may arise when any individual is engaged to contribute, undertake or audit the EPA and:
 - Is directly involved in the apprentice's programme of learning or assessments;
 - Is not directly involved in the apprentice's programme but is employed by an organisation with an interest in their apprentice's completion of a programme;
 - Is employed by the training provider or employer that delivers the programme of learning
 - Line-manages the apprentice;
 - Is known to the apprentice
 - Has friends or relatives taking the apprenticeship programme to which the EPA is aligned.

3.3 Conflicts of interest can arise in a variety of circumstances relating to IAMI's EPA activities, for example:

- Where IAMI is involved in an advisory role towards the training programme provider
- Where the EPA assessor carries out work for IAMI but may have personal interests – paid or unpaid – in another business which engages with the employer or training provider that uses IAMI services.
- Where a training provider or employer provide services to IAMI to enable them to undertake the EPA assessment

4. EPA Conflict of Interest Register

- 4.1 IAMI will maintain a EPA Conflict of Interest Register which includes all Assessors engaged on its behalf, as well as all Directors to ensure their independence of the EPA process.
- 4.2 Each assessor must declare any conflicts of interest before being engaged for each specific EPA they undertake by completing IAMI form A1, declaring:
- Any prior knowledge of the apprentice being assessed
 - Any prior employment and / or work with the employer or training provider that have requested the EPA from IAMI
- 4.3 This EPA Conflict of Interest Register will be maintained by the Secretariat and reported to the Board of Directors each year, even where no changes are made

5. IAMI membership

- 5.1 IAMI are a membership organisation providing services to its members. As all users of the IAMI EPA services are required to be IAMI members then these IAMI policies and processes must ensure the independence of the EPA process. There will be no preferential treatment during assessment given to any employer or training provider as IAMI members. All assessments, regardless of this membership must be carried out using current IAMI processes and policies to ensure a fair and consistent assessment.

6. Investigation procedure

Where a failure to disclose a potential or actual conflict of interest, or an allegation that any conflict exists that would influence the assessment, is brought to IAMI's attention then an investigation will take place.

This investigation will determine if there is an actual conflict of interest, any potential adverse effect and recommend any mitigation measures or actions that may be required.

The investigation procedure is outlined below:

- 6.1 The IAMI Secretary will undertake the initial investigation
- 6.2 Record as much detail of the potential conflict of interest as possible, including the names of the person/people raising the concern, the person concerned, and all evidence provided
- 6.3 Where the IAMI Secretary is involved in the assessment, or is named in the evidence within 6.2, then the investigation will be passed to an independent Director who is not conflicted in any way
- 6.4 The investigation will be completed within ten (10) working days unless further information or evidence is requested.
- 6.5 The IAMI Secretary or investigating Director will produce a report of their findings. This report should determine as a minimum whether:
 - 6.5.1 The assessment under investigated should be annulled and retaken
 - 6.5.2 Other assessments by the person/s accused of a conflict of interest should be re-examined or investigated
 - 6.5.3 The IAMI employee should be retained for future EPA assessments
 - 6.5.4 IAMI policies and processes require modification or change
 - 6.5.5 Recommendations that will prevent further conflicts of interest from recurring
- 6.6 This report will be presented to the IAMI Directors for their review and response. A record will be actions to be recorded within the Conflict of Interest Register within worksheet "Conflicts investigated".

7. Management process

- 7.1 All persons employed as a Director, Official or EPA assessor will complete IAMI form A1 on engagement when they are required to sign their Contract for Services. Assessors are required to update their form A1 annually to enable the Register of Conflicts register to be updated.
- 7.2 Where an identified potential conflict is raised, then the assessor will not be assigned to those apprentices, training provider and/or employers.

- 7.3 In accordance with the IAMI Governance Policy, no Director can be directly involved at any stage in the actual assessment of apprentices, with the exception of monitoring of the assessment outcomes via EPA annual reports and audit reports. Directors are required to submit the annual declaration of interests to ensure possible conflicts are avoided.
- 7.4 Any identified potential or actual conflict of interest that cannot be resolved by re-assigning the EPA to another assessor without a declared conflict of interest, then the IAMI Secretary will escalate the issue to the IAMI Board of Directors for advice and guidance. These actions to be recorded within the Conflict of Interest Register within the worksheet "Actions taken". One example would be where only the employer can assess their apprentice. In this instance an independent observer must be employed to oversee any assessment.
- 7.5 Where the conflict of interest involves the IAMI Secretariat, then the conflict of interest would be brought to the attention of the IAMI Chair at chairman@iami.org.uk
- 7.6 Resolution will be on the basis of ensuring the best interests of the apprentice is uppermost and complies with the principles and purpose of the end point assessment.

8. Policy Review

The effectiveness of this policy will be reviewed every three years in light of experience and best practice. This mechanism recognises that changes as a result of experience may prompt a review of the policy before the end of the three year period.