



End-point assessment plan for Public Sector Compliance Investigator/Officer apprenticeship standard

Apprenticeship standard reference number	Level of this end point assessment (EPA)	Integrated
ST0708	3	No

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Introduction and overview

This document sets out the requirements for end-point assessment (EPA) for the Public Sector Compliance Investigator/Officer apprenticeship standard. It is for end-point assessment organisations (EPAOs) who need to know how EPA for this apprenticeship must operate. It will also be of interest to Public Sector Compliance Investigator/Officer apprentices, their employers and training providers.

Full time apprentices will typically spend 18 months on-programme (before the gateway) working towards the occupational standard, with a minimum of 20% off-the-job training. All apprentices will spend a minimum of 12 months on-programme.

The EPA period should only start, and the EPA be arranged, once the employer is satisfied that the apprentice is consistently working at or above the level set out in the occupational standard, all of the pre-requisite gateway requirements for EPA have been met and that they can be evidenced to an EPAO.

All pre-requisites for EPA assessment methods must also be complete and available for the assessor as necessary.

For level 3 apprenticeships and above apprentices without English and mathematics at level 2 must achieve level 2 prior to taking their EPA.

The EPA must be completed within an EPA period lasting a maximum of 4 month(s), beginning when the apprentice has passed the EPA gateway.

The EPA consists of 2 discrete assessment methods.

The individual assessment methods will have the following grades:

Assessment method 1: Professional discussion underpinned by Portfolio

- Pass
- Fail
- Distinction

Assessment method 2: Case Study Test

- Pass
- Fail
- Distinction

Performance in the EPA will determine the overall apprenticeship standard and grade of:

- Pass
- Fail
- Distinction

EPA summary table

On-programme (typically 18 months)	Training to develop the occupation standard's knowledge, skills and behaviours.
End-point Assessment Gateway	<ul style="list-style-type: none"> • Employer is satisfied the apprentice is consistently working at, or above, the level of the occupational standard. • English/mathematics Level 2 <p>Apprentices must complete:</p> <ul style="list-style-type: none"> • A portfolio: The format and structure of the portfolio needs to be agreed between the employer and the apprentice (e.g. paper based or computer based). However, the content must be sufficient to evidence the apprentice can apply the knowledge, skills and behaviours required as mapped to assessment method 1 (AM1). There must be at least one piece of evidence relating to each knowledge, skill and behaviour mapped to AM1. One piece of evidence can be referenced against more than one knowledge, skill or behavioural requirement. It is expected there will be a minimum of 10 pieces and a maximum of 15 pieces of portfolio sample evidence, which will cover all duties in the Standard. The portfolio should contain written accounts of activities that have been completed and referenced against the knowledge, skills and behaviours, supported by appropriate evidence, including work products, work instructions, safety documentation, company policies and procedures as appropriate to the activities. Progress review documentation, witness testimonies, and feedback from colleagues and/or clients may also be included. Portfolio content must be factual, and should not include reflective accounts or self-evaluations. While the apprentice will receive support and guidance during the on-programme training, the portfolio must be based on the apprentices evidence not the support and guidance others can provide.
End Point Assessment (which will take a maximum of 4 months)	Assessment Method 1: Professional discussion underpinned by Portfolio Assessment Method 2: Case Study Test

Length of end-point assessment period:

The EPA must be completed within an EPA period lasting a maximum of 4 month(s), beginning when the apprentice has passed the EPA gateway.

The portfolio should be submitted no later than 2 weeks after the start of the EPA period.

If an EPA assessment method is failed, it should be retaken within the EPA period and in-line with the requirements set out in this assessment plan.

Order of assessment methods

The assessment methods can be delivered in any order.

Gateway

The EPA period should only start once the employer is satisfied that the apprentice is consistently working at or above the level set out in the occupational standard, that is to say they have achieved occupational competence. In making this decision, the employer may take advice from the apprentice's training provider(s), but the decision must ultimately be made solely by the employer.

In addition to the employer's confirmation that the apprentice is working at or above the level in the occupational standard, the apprentice must have completed the following gateway requirements prior to beginning EPA:

- English and mathematics at level 2.

For those with an education, health and care plan or a legacy statement the apprenticeships English and mathematics minimum requirement is Entry Level 3 and British Sign Language qualification are an alternative to English qualifications for whom this is their primary language.

For professional discussion underpinned by Portfolio, the apprentice will be required to submit a portfolio, signed off by the employer (typically this will be the line-manager, mentor or coach), which demonstrates the Knowledge, Skills and Behaviours identified as applicable to this assessment method.

For case study test: no specific requirements

Assessment methods

Assessment Method 1: Professional discussion underpinned by Portfolio (This Method has 1 component.)

Method 1 Component 1: Professional Discussion

Overview

This assessment will take the form of a professional discussion, which must be appropriately structured to draw out the best of the apprentice's competence and excellence and cover the KSBs assigned to this assessment method. It will involve the questions that will focus on coverage of prior learning or activity.

The professional discussion can take place in any of the following:

- employer's premises
- a suitable venue selected by the EPAO (e.g. a training provider's premises)
- remote video conference call

The rationale for this assessment method is:

The lifecycle of an investigation/inspection can take weeks or even months, and a Professional Discussion, underpinned by Portfolio is the best way to capture evidence of this nature, tested via discussion. This method also suits assessment of a disparate set of KSBs.

Delivery

The independent assessors will conduct and assess the professional discussion.

The professional discussion must last for 90 minutes. The independent assessor has the discretion to increase the time of the professional discussion by up to 10% to allow the apprentice to complete their last answer. Further time may be granted for apprentices with appropriate needs, for example where signing services are required. The professional discussion will be conducted as set out here:

The professional discussion will focus on the portfolio completed by the apprentice during the on-programme phase of the Apprenticeship, and the independent assessor will seek to gain assurance of the apprentice's competency by questioning.

The independent assessor will receive the Portfolio 2 weeks after the gateway. The Independent Assessor will draw 10 questions from the EPAO's question bank to ask the apprentice.

All 10 questions must be asked. The independent assessor may ask up to a total of 10 additional follow up questions within the time permitted for the Professional Discussion to delve deeper into the apprentice's answers if this is necessary. The apprentice may refer to their Portfolio during the discussion should they wish to.

Video conferencing can be used to conduct the professional discussion, but the EPAO must have processes in place to verify the identity of the apprentice and ensure the apprentice is not being aided in some way.

The independent assessor must use the assessment tools and procedures that are set by the EPAO to record the professional discussion.

The independent assessor will make all grading decisions.

Venue

The professional discussion should take place in a quiet room, free from distractions and influence.

Other relevant information

A structured specification and question bank must be developed by EPAOs. The 'question bank' must be of sufficient size to prevent predictability and review it regularly (and at least once a year) to ensure that it, and its content, are fit for purpose. The specifications, including questions relating to the underpinning knowledge, skills and behaviours, must be varied yet allow assessment of the relevant KSBs.

EPAOs must ensure that apprentices have a different set of questions in the case of re-sits/re-takes.

Independent assessors must be developed and trained by the EPAO in the conduct of professional discussion and reaching consistent judgement.

EPAOs will produce the following material to support this assessment method:

- outline of the professional discussion's requirements
- marking materials
- question bank

Assessment Method 2: Case Study Test (This Method has 1 component.)

Method 2 Component 1: Case Study Test

Overview

The rationale for this assessment method is:

Whereas the professional discussion will centre on the apprentices real-work experiences, case studies are intended to assess synoptically the apprentice's competence from a different perspective, setting the apprentice fictitious scenarios and seeking their responses.

The case studies may be based on a variety of different organisational structures or operations and success will require an integration of the technical knowledge, the skills and behaviours required for the standard.

Test Format

The test can be:

- paper based
- computer based

It will consist of 5 questions. The test will consist of:

Questions that cover the Knowledge, Skills and Behaviours identified as applicable to this assessment method within the grading criteria.

A total of 5 scenario-based questions based on one case study. The assessment is open book i.e. the apprentice will be able to refer to reference books or materials.

At the start of the case study test, the apprentice will be presented with a maximum of 5 pages of information about a particular scenario. The apprentice will be given up to an hour to review the information. They may make notes and prepare during that hour as they wish.

Further information about the scenario will then be provided, and the apprentice will be asked to answer five previously unseen questions and provide written responses. Each case study will be sufficiently complex as is appropriate at Level 3 and represent the case progression of likely situations the apprentice will encounter in their work. This might mean, for example, a whistle-blowing report to a regulator, setting out concerns that a care home is not providing the required duty of care to its residents; or it might be based on a financial return that contains irregularities. Additional information about the scenario, presented during the case study, will challenge what apprentices were expecting to see, thereby assessing their adaptable behaviour.

The case study (s) will require the apprentice to answer 5 questions covering:

- a) Analysis and interpretation of data
- b) Assessment of compliance risk using commercial knowledge
- c) Identification of options
- d) Decision-making
- e) Communicating recommendations.

The case study will present open questions requiring extended responses.

Test administration

Apprentices must have a maximum of 180 minutes to complete the test.

The test is open book which means that the apprentice can refer to reference materials (notes and annotations to the case study).

The Case Study Test will be developed and hosted by the EPAO.

Apprentices must take the test in a suitably controlled environment that is a quiet space, free of distractions and influence, in the presence of an invigilator. The invigilator may be the independent assessor. The EPAO is required to have an invigilation policy that will set out how the test/examination

is to be carried out. This will include specifying the most appropriate ratio of apprentices to invigilators to best take into account the setting and security required in administering the test/examination.

The EPAO is responsible for ensuring the security of testing they administer to ensure the test remains valid and reliable (this includes any arrangements made using online tools). The EPAO is responsible for verifying the validity of the identity of the person taking the test.

The EPAO must verify the suitability of the venue for taking the test and the identity of the person taking the test.

Marking

Tests must be marked by independent assessors or markers employed by the EPAO following a marking guide produced by the EPAO. Alternatively, marking by computer is permissible where questions types allow this, to improve marking reliability.

The EPAO will ensure that the test paper is set in line with the regulations of the EPAO, assuring that the paper is valid and reliable. The EPAO is responsible for setting and marking the examination paper and construction of the answer marking guide. The Case Study Test has 5 questions. There are 20 marks available in total, with each question attracting 4 marks – i.e. the questions are equally weighted. Partial credit will be awarded for partial responses. Any missing answers must be assigned 0 marks.

Question and resources development

Questions must be written by EPAOs and must be relevant to the organisation while testing full occupational competence.

EPAOs must develop case studies and question banks of sufficient size to prevent predictability and review them regularly (and at least once a year) to ensure they, and the questions they contain, are fit for purpose.

Required supporting material

As a minimum EPAOs will produce the following material to support this method:

- Case study test bank of fictitious scenarios
- The follow-up information needed relating to each fictitious scenario
- 5 questions per case study test.

Weighting of assessment methods

Both assessment methods are weighted equally in their contribution to the overall EPA grade.

Grading

Assessment method 1: Professional discussion underpinned by Portfolio

KSBs	Fail	Pass	Distinction
K1	Does not meet the pass criteria	Can describe the legal frameworks, powers and legislation relevant to their role, and how these affect compliance/investigations Can provide an overview of key organisational policies and how they inform and govern what they do, and how they behave	
K3	Does not meet the pass criteria	Can explain the business environments they interact with, and the factors that affect business approaches to compliance Can demonstrate how they use this understanding to identify risks	
K4	Does not meet the pass criteria	Can describe the ethical standards (including code of conduct) that are relevant to the sector, role and organisation, whilst demonstrating and understanding professional integrity.	
K5	Does not meet the pass criteria	Can explain the main systems and processes relevant to their job role and team, and how these support compliance in their organisation	Can explain how the use of different processes and controls in their organisation make the compliance/investigation/inspection process more effective
S1	Does not meet the pass criteria	Can explain relevant legislation, powers and organisational policies to progress work, recognising the impacts of their application.	
S4	Does not meet the	Can demonstrate how they have built and maintained collaborative and professional relationships that	

	pass criteria	support proportionate compliance activities, both within their organisation and externally.	
S6	Does not meet the pass criteria	Can demonstrate how they create an effective plan to manage and sequence their work, meeting any organisational quality standards.	
S9	Does not meet the pass criteria	Can show how they resolve differences in opinion, and how they manage and respond to difficult situations calmly and confidently	
S10	Does not meet the pass criteria	Can demonstrate how they develop the compliance expertise of themselves and others. Can show how they set clear goals, and how they inspire colleagues to support in achieving these goals.	Can explain how to build a high-performing team by supporting and developing individuals, and motivating them to achieve.
S12	Does not meet the pass criteria	Can show their proficiency in the use of business IT systems to meet a broad range of customer needs.	Can describe how the use of business IT systems can make the compliance / investigation process more effective.
B1	Does not meet the pass criteria	Correctly identifies any ethical issues raised, and the appropriate course of action to address these, including how they would ensure any confidentiality, independence and objectivity.	
B2	Does not meet the pass criteria	Can demonstrate how they manage and adapt their work and priorities to meet customer and business requirements, whilst delivering quality outcomes. Can show how they share their professional expertise with colleagues to improve professional capability.	
B3	Does not meet the	Adapts their approach and behaviour to respond positively to changes in circumstances.	Demonstrate throughout the case study how they use reflection to moderate and

	pass criteria		adjust behaviours where the situation becomes challenging, or there is potential for disagreement or conflict.
B4	Does not meet the pass criteria	Demonstrate the ability to question and verify the accuracy or integrity of information or evidence presented to them	

Assessment method 2: Case Study

KSBs	Fail	Pass	Distinction
K2	Does not meet the pass criteria	Demonstrate they understand the different types of potential data they need, and how they could use and present that data to draw conclusions in response to data irregularities.	
S2	Does not meet the pass criteria	Scrutinises data using an investigative approach and correctly identifies gaps and irregularities. Demonstrate they can utilise evidence correctly, and maintain accurate records of their investigation.	
S3	Does not meet the pass criteria	Forms an accurate judgement on the level of risk by taking into account the internal and external environment of the organisation being audited/investigated.	

S5	Does not meet the pass criteria	They assess alternatives and select the right solution to support judgements and decisions.	
S7	Does not meet the pass criteria	Identifies the extent of the risks and produces a proportionate response, using organisational risk assessment methodologies.	They identify at least two potential compliance risk implications that go beyond the scope defined in the case study.
S8	Does not meet the pass criteria	<p>Presents appropriate facts and evidence to their audience using clear, accurate and concise communications.</p> <p>Uses a range of questioning techniques to extract detail to meet information gaps and discrepancies.</p>	Recognises their audience needs and adapts presentation style to accommodate this.
S11	Does not meet the pass criteria	Uses problem solving methodology to identify solutions that are satisfactory to all parties.	Sets criteria for judging potential solutions, and evaluates the best option to resolve the problem.

Overall EPA grading

All EPA methods must be passed for the EPA to be passed overall.

A pass in both methods is needed for a pass overall. Likewise, a distinction in both methods is needed for a distinction overall.

Grades from individual assessment methods should be combined in the following way to determine the grade of the EPA as a whole:

Assessment method 1	Assessment method 2	Overall grading
Pass	Pass	Pass
Pass	Fail	Fail
Pass	Distinction	Pass
Fail	Pass	Fail
Fail	Fail	Fail
Fail	Distinction	Fail
Distinction	Pass	Pass
Distinction	Fail	Fail
Distinction	Distinction	Distinction

Roles and responsibilities

Role	Responsibility
Apprentice	<ul style="list-style-type: none"> complete the on-programme element of the apprenticeship prepare for and complete the EPA
Employer	<ul style="list-style-type: none"> identify when the apprentice is ready to pass the gateway and undertake their EPA notify the EPAO that the apprentice has passed the gateway
EPAO	<p>As a minimum EPAOs should:</p> <ul style="list-style-type: none"> appoint administrators/invigilators and markers to administer/invigilate and mark the EPA provide training and CPD to the independent assessors they employ to undertake the EPA Create learner specifications detailing the EPA, process, content etc.

	<ul style="list-style-type: none"> • ensure there is no direct connection with the apprentice, their employer or training provider i.e. there must be no conflict of interest • have processes in place to conduct internal quality assurance and do this on a regular basis • organise standardisation events and activities in accordance with this plan's IQA section • organise and conduct moderation of independent assessors' marking in accordance with this plan • have, and operate, an appeals process • conform to the requirements of the nominated EQA provider
Independent assessor	<p>As a minimum an Independent assessor should:</p> <ul style="list-style-type: none"> • be independent of the apprentice, their employer and training provider(s) i.e. there must be no conflict of interest • hold or be working towards an independent assessor qualification e.g. A1 and have had training from their EPAO in terms of good assessment practice, operating the assessment tools and grading • have the capability to assess the apprentice at this level i.e. meet the occupational requirements as set out in the IQA section of this assessment plan • attend the required number of EPAOs standardisation and training events per year (as defined in the IQA section)
Training provider	<p>As a minimum the training provider should:</p> <ul style="list-style-type: none"> • work with the employer to ensure that the apprentice is given the opportunities to develop the KSBs outlined in the standard and monitor their progress during the on-programme period • advise the employer, upon request, on the apprentice's readiness for EPA prior to the gateway <p>• Plays no part in the EPA itself</p>

Internal Quality Assurance (IQA)

Internal quality assurance refers to the requirements that EPA organisations must have in place to ensure consistent (reliable) and accurate (valid) assessment decisions. EPA organisations for this EPA must:

- appoint independent assessors who have knowledge of the following occupational areas: Experience of working in a Public Sector compliance environment, including managing a caseload, assessing evidence of potential non-compliance, making appropriate investigations, decisions and escalations.
- appoint independent assessors who have recent relevant experience of the occupation/sector at least one level above the apprentice gained in the last three years or significant experience of the occupation/sector.
- appoint independent assessors who are competent to deliver the end-point assessment
- provide training for independent assessors in terms of good assessment practice, operating the assessment tools and grading
- have robust quality assurance systems and procedures that support fair, reliable and consistent assessment across the organisation and over time.
- operate induction training when they begin working for the EPAO on this standard and before they deliver an updated assessment method for the first time
- Arrange at least one standardisation event per year which independent assessors should attend

Re-sits and re-takes

Apprentices who fail one or more assessment method will be offered the opportunity to take a re-sit or a re-take. A re-sit does not require further learning, whereas a re-take does.

Apprentices should have a supportive action plan to prepare for the re-sit or a re-take. The apprentice's employer will need to agree that either a re-sit or re-take is an appropriate course of action.

An apprentice who fails an assessment method, and therefore the EPA in the first instance, will be required to re-sit any failed assessment methods only.

Any assessment method re-sit or re-take must be taken during the maximum EPA period, otherwise the entire EPA must be taken again, unless in the opinion of the EPAO exceptional circumstances apply outside the control of the apprentice or their employer.

Re-sits and re-takes are not offered to apprentices wishing to move from pass to distinction.

Where any assessment method has to be re-sat or re-taken, the apprentice will be awarded a maximum EPA grade of pass, unless the EPAO determines there are exceptional circumstances requiring a re-sit or re-take. All re-sits and re-takes will require the Professional Discussion to use different questions and a different case study test from those the Apprentice has previously seen.

Affordability

Affordability of the EPA will be aided by using at least some of the following practice:

- using an employer's premises
- Use of video conference call for the professional discussion

Professional body recognition

Professional body recognition is not relevant to this occupational apprenticeship.

Reasonable adjustments

The EPAO must have in place clear and fair arrangements for making reasonable adjustments for this apprenticeship standard. This should include how an apprentice qualifies for Reasonable Adjustment and what Reasonable Adjustments will be made. The adjustments must maintain the validity, reliability and integrity of the assessment methods outlined in this assessment plan.

Mapping of knowledge, skills and behaviours (KSBs)

Assessment method 1: Professional discussion underpinned by Portfolio

Knowledge
<p>K1 Legislation, policies and procedures Understands the basic principles of the relevant legal framework, powers and legislation and how these apply to their role. Understands the relevance and appropriate application of organisational policies (such as employee code of conduct and relevant policies concerning information technology and data governance). Understands how relevant Data Protection and Freedom of Information legislation applies to the role and the organisation, and the potential impact on investigations.</p>
<p>K3 Commercial/Sector Understanding Awareness of the range of business types within their sector, how they are structured and managed and (if appropriate) financed. Understands how these affect business behaviour, and knows how to use this knowledge to identify risk.</p>
<p>K4 Ethical Standards Understands the ethical standards that the organisation and sector requires of its employees and the implications of these for the role</p>
<p>K5 Systems and Processes Understands the systems, tools and processes used in the role, and how these impact on their team, and their wider organisation.</p>

Skills
<p>S1 Application of technical knowledge Progresses and resolves technical queries by applying the relevant legislation and powers. Apply relevant organisational policies to all elements of work Effectively applies relevant Data Protection and Freedom of Information legislation and identifies the potential impact on investigations, the role and the organisation.</p>
<p>S4 Team Working and Collaboration Maintains effective, professional working relationships both internally and externally across organisations. Builds and maintains new partner/stakeholder relationships with those involved in investigations to achieve progress on objectives, key initiatives and shared interests.</p>
<p>S6 Workload management Applies organisational quality standards in order to deliver effective outcomes. Plans and prioritises activity accordingly in line with organisational key performance indicators. Co-ordinates the structure and sequence of workload activities to effectively manage competing demands</p>
<p>S9 Negotiation and Conflict Management Uses diplomacy and tact appropriately to mediate and reconcile different points of view or resolve problems Manages conflict and handles dissension calmly and confidently Explains and defends their point of view; thinks clearly and rapidly under pressure and uncertainty Demonstrates confidence and resilience when faced with tough situations (for example when dealing with external agencies such as regulators)</p>

S10 Leadership Demonstrates drive and enthusiasm for developing own compliance capability and that of others Engages with and inspires others to be the best Communicates goals clearly and instils in others a desire to assist in implementing them

S12 IT Skills Uses appropriate organisational technology with confidence to meet the diverse needs of customers and stakeholders

Behaviours

B1 Ethics, Integrity and Discretion Demonstrates honesty and sincerity and is trustworthy in their actions. Clearly demonstrates the desire to do the right thing, displaying tact and diplomacy in their dealings with others. Maintains appropriate confidentiality at all times. Puts the obligations of public service above their own personal interests.

B2 Professional Effectiveness Continuously develops their professional capability to meet the needs of the business and its customers. Effectively manages their time, workload and priorities to deliver a quality service. Resolves problems and adapts to new situations. Develops and shares their professional expertise to build the capability of colleagues within their team

B3 Receptive and Responsive Changes behavioural style or method of approach when necessary to achieve a goal; adjusts style as appropriate to the needs of the situation. Responds to change with a positive attitude and a willingness to learn new ways to accomplish work activities and objectives.

B4 Inquisitive and Challenging Employs a healthy and positive scepticism when gathering and analysing information or in dealings with stakeholders or customer to verify the accuracy of their records and integrity of their actions

Assessment method 2: Case Study

Knowledge

K2 Analysing and Interpreting Data Understands the range of potential data and other information sources; knows how to use them to make informed judgements. Understands how to prepare and present findings in relation to irregularities in data.

Skills

S2 Analysing and Interpreting Data Gather, examine and analyse customer records/data/information from a number of sources to identify potential inaccuracies, anomalies and non-compliance. Uses an investigative approach to establish the facts. Identifies, collects, retains and disseminates evidence in a correct and lawful manner. Handles sensitive information securely. Ensure all records relating to investigations are accurate and comprehensive.

S3 Commercial/Sector Insights Delivers effective risk management and compliance by recognising and applying relevant insight knowledge regarding the business types within their sector (including how businesses are structured, managed and (if appropriate) financed).

<p>S5 Decision Making Uses effective problem solving techniques to make well-informed judgements/decisions Uses information from a range of sources to determine the appropriate course of action, escalating decisions to senior managers when appropriate.</p>
<p>S7 Assessing Compliance Risk Applies knowledge of customer's business and activities to identify risk Identifies the proximity/extent of risk and address risks with an appropriate response to bring cases/investigations to conclusion. Uses organisational risk assessment methodologies as tools to support compliance/investigation Plans and undertakes interventions that target and are proportionate to the identified risk Uses reflective and independent thinking to identify the logical connection between business policies and compliance regulations. Thinks creatively to generate solutions to unique compliance issues.</p>
<p>S8 Communication Presents fact based evidence to customers/third parties in ways that they can understand in order to progress case/issue. Drafts concise, clear and accurate reports; writes clear and concise letters, e-mails and other items of correspondence Recognises all stakeholders (both internal and external) and demonstrates appropriate professional communication and engagement methods Recognises discrepancies and gaps in information and uses a range of questioning techniques to clarify and extract as much detail as possible</p>
<p>S11 Problem Solving Identifies problems, devises alternatives, evaluates alternatives and then implements the most viable solutions Combines innovative and analytical thinking to address problems and identify solutions Demonstrates tenacity and persistence to resolve the problem to the mutual satisfaction of all concerned</p>