

The

Lloyd Williamson

Schools Foundation

**Conflict of Interest
Policy (Exams)**

2022-2023

Introduction

The Lloyd Williamson Schools Foundation has a Conflict of Interest policy in order to enable us to identify, manage and mitigate any potential conflicts of interest. All staff and other individuals have a responsibility to be aware of the potential for a conflict of interest.

Purpose

The purpose of this policy is to protect our integrity as a business and the integrity of our qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of the Academy's role in delivering courses.

This policy:

- defines what is meant by conflict of interest.
- describes the role of conflict of interest in the context of working with, or for, an awarding organisation.
- sets out the responsibilities for managing conflict of interest at each level in the organisation.

Scope of policy

This policy applies to all staff and other individuals who interact or potentially interact with the work of the awarding organisation. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, marking or any other activity connected with qualifications, tests and assessments, and supporting resources and services.

The individuals falling within the scope of this policy include all staff employed by the schools on a full time, part time, peripatetic or casual basis.

Definition of conflict of interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances for example: When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation. When an individual has interests that conflict with his or her professional position. Where someone works for or carries out work on the schools' behalf but may have personal interests – paid or unpaid – in another business. Where someone works for or carries out work on the schools' behalf, who has friends or relatives taking assessments or examinations.

The Joint Council for Qualifications (JCQ) has specific requirements regarding potential conflicts of interest relating to examinations:

The awarding bodies are required by the qualification regulators to ensure that any Conflict of Interest in relation to the design, delivery and awarding of examinations/assessments is identified, recorded and managed effectively. In turn, centres are required to take all reasonable steps to ensure that the awarding bodies are able to comply with this regulatory condition.

What is a Conflict of Interest?

In this context, a Conflict of Interest occurs where any member of staff who has access to privileged information, or is responsible for making decisions about assessment outcomes, could, potentially, use that information, or their position, to give an unfair advantage to a close friend or relative entered for an examination/assessment at your or any other centre. The term 'Related People' is used to cover close friends or relatives. A Conflict of Interest also occurs if any member of your centre's staff is entered for an examination/assessment.

Who are 'Related People'? 'Related People' are those with whom the member of staff has a close relationship. It would certainly include spouses, children and siblings, but would also include close friends, relatives and members of the household where there is regular contact, such that privileged information might be shared inappropriately. A step-relative, cousin, niece, etc., would count if the contact with that person was close and frequent.

Principles

LWSF will:

Review its processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.

Ensure that the contractual arrangements clearly set out any obligations on them to declare and manage conflicts of interest arising from other activities that they undertake.

Ensure that anyone who has access to confidential assessment material for a qualification understands the confidential nature of the content.

Ensure that all members of staff declare any interest for friends or family sitting examinations.

Responsibilities

The trustees have the ultimate responsibility for the Conflict of Interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the SLT.

The Exams Officer is responsible for communicating the Conflict of Interest Policy to all relevant individuals annually.

Admin staff are responsible for ensuring that all new staff receive conflict of interest information.

Any potential or actual conflict of interest must be documented by the Exams Officer.

For issues that cannot be resolved, issues will be reported to the Trustees.

The Exams Officer will ensure that all JCQ requirements are adhered to and will maintain appropriate records accordingly. (See annexe 1).

All staff

- Individuals within LWSF have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete and required conflict of interest training.
- All individuals will be required annually to read and understand the Conflict of Interest Policy.
- The most important feature of the policy is the requirement that an individual disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether or not it represents a conflict of interest it should be reported.
- The individual and SLT are equally responsible for ensuring that the issue is documented carefully.
- An individual may wish to raise concerns relating to conflict of interest directly with their line manager. This may be done in confidence and they are entitled to receive a response to their concerns.
- Any staff member considering paid or unpaid work outside of the schools should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the Co-principal if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with LWSF activities (see the Restricted).
- Prior to each examination series, all staff and other individuals, must inform the Exams Officer of any candidates being entered for its examinations at the school and also at any other examination centre who are family members, other relatives or friends by completing the form in annexe 2.
- The Exams Officer is responsible for escalating reports of actual or potential conflicts of interest to the Co-Principal.
- The Co-principal or Exams Officer will begin an investigation of any issues identified within 48 hours. A preliminary report will be made available to the SLT within 5 working days.

Last updated April 2023

Lucy Meyer
Co-principal

Deborah Thackeray
Examination Officer

Annexe 1

Conflict of Interest log (June 2022 Exam Series)

Date recorded	Staff name & job title(s)	Interest declared	Nature of any potential Conflict of Interest	Specific Conflict of Interest	Steps being taken to manage the risk represented by any Conflict of Interest
	Sitting exam at this centre			<ul style="list-style-type: none">Declared to awarding body	The following protocols are in place: (to prevent the member of staff having access to exam/assessment materials prior to the exam/assessment and that other centre staff are briefed on maintaining the integrity and confidentiality of the examination materials)

This log will be kept for a minimum of one year after results have been issued for the relevant exam series

Annexe 2

Declaration of Interest form 2023

To comply with the regulations, the centre is required to manage conflicts of interest and inform the relevant awarding body/bodies (by the published deadline for entries for each examination series) of:

- any members of centre staff who are taking qualifications at their own centre which include internally assessed components/units
- any members of centre staff who are teaching and preparing members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications which include internally assessed components/units, **and**

maintains clear records of **all instances** where:

- exams office staff have members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) being entered for examinations and assessments either at the centre itself or other centres
- centre staff are taking qualifications at their centre which **do not** include internally assessed components/units
- centre staff are taking qualifications at other centres

To ensure compliance, you must declare (by ticking) any of the statements that apply to you and complete the required information in the white boxes.

Your name		Your job title(s)/role(s)	
Subject(s) you teach (if applicable to your role)			

Please tick any statement/statements that applies/apply to you and complete the required information (or will apply to you during the **2021/22** academic year)

- I am taking a qualification(s) at this centre which includes an internally assessed component/unit

Qualification(s) I am taking	Awarding body	Qualification type	Specification (Subject)

Steps I have taken to seek an alternative centre at which to take the qualification(s)

- I am teaching and preparing a member of my family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for a qualification(s) which includes an internally assessed component/unit

(Where more than one related person, please complete a separate form)

Name of related person (the candidate)			
Candidate number			Relationship to me
Qualification(s) being taught and prepared for	Awarding body	Qualification type	Specification (Subject)

- I am a member of staff and have a member of my family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) being entered for examinations and assessments at this centre or another centre

(Where more than one related person, please complete a separate form)

Name of related person (the candidate)			
Where the candidate is being entered	<input type="checkbox"/> This centre <input type="checkbox"/> Another entering centre (tick box as applies)		
Candidate number (if this centre)		Relationship to me	
Entering centre name (if not this centre)		Entering centre number (if known)	

- I am taking a qualification at this centre which does not include internally assessed components/units
- I am taking a qualification at another centre

Qualification(s) I am taking	Awarding body	Qualification type	Specification (Subject)	Exam series
------------------------------	---------------	--------------------	-------------------------	-------------

Entering centre name			Entering centre number (if known)	

I have none of the above statements to declare

Date declaration(s) made:

Signature to confirm declaration(s):

This completed form (including date and signature) must be returned to Deborah Thackeray by

The declaration(s) you have provided will be used to inform the relevant awarding body/bodies (where required) and to record details of the measures taken to mitigate any potential risk to the integrity of the qualifications affected. You will be informed if/where any measures or protocols put in place directly affect you.

All records are subject to inspection by the JCQ/awarding body on request and will be retained until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later (for the relevant exam series).

FOR HEAD OF CENTRE/EXAMS OFFICER USE ONLY

Date	Action
	Completed Declaration form received
	Declaration(s) recorded on Conflicts of Interest (COI) log
	Awarding body/bodies informed of specific COI (where applicable)
	Staff member informed of measures/protocols in place to manage the risk represented by the COI