



LLOYD WILLIAMSON
FOUNDATION

The Lloyd Williamson Schools Foundation

CONFLICT OF INTEREST POLICY
(Exams)

2024-2025

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 staff and students as well as our integrity as a centre.

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 occurs when an individual has competing interests or loyalties. The conflict of interest could compromise or appear to compromise their decisions if it is not properly managed. For the purposes of this policy, situations where a conflict of interest occurs are:

- A member of staff taking a qualification at the centre which includes internally assessed components/units (taking at the centre as a last resort where unable to find an alternative centre)
- A candidate being taught and prepared for any qualification (including internally assessed components/units by a member of staff with a personal connection to the candidate)
- A member of exams staff with a personal connection to a candidate being entered for exams at the centre
- A member of centre staff taking a qualification at the centre which does not include internally assessed components/units (taking at the centre as a last resort where unable to find an alternative centre)
- A member of staff taking a qualification at another centre
- 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 comply with the JCQ and other awarding bodies conflict of interest regulations by:

- Ensuring the relevant awarding bodies are informed of any conflict of interest
- Requiring staff to sign a Declaration of Interest form for any student who is a close friend or relative as the student starts GCSE/IGCSE courses and then before the published deadline for entries for each examination series
- Recording a list of staff who have a conflict of interest and sharing that with Exams Officer so that they are aware and can take necessary action to mitigate
- Maintaining records that confirm the measures taken to mitigate any potential risk to the integrity of the qualifications affected
- Ensuring other relevant centre staff, where they may be involved in the receipt and dispatch of confidential exam materials, are briefed on the requirements for maintaining the integrity and confidentiality of the exam materials.

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.

All staff have responsibility for ensuring that they are familiar with the Conflict of Interest policy and guidelines. Staff are required to make a declaration as soon as they become aware of a potential conflict.

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, using the Exams Office form.

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).

Making a declaration

- All staff who identify that they potentially have a conflict of interest are required to sign a Centre Staff Declaration Form. These forms and a list of all staff involved are kept in a folder in the Exams Office. Declarations are treated confidentially within the bounds of what is required to be reported to the awarding bodies. 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 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 undeclared 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.

Action following a declaration

Depending on the nature of the declaration, (i) a report is made to the relevant awarding body and/or (ii) a log is kept of any action taken to mitigate risk. The individual concerned and Exams Officer are equally responsible for ensuring that the issue is documented carefully. Clear records are kept which include details of measures taken to mitigate any potential risk to the integrity of the qualifications involved. Records are held by the Exams Officer to be available for inspection by JCQ inspectors and/or awarding body staff if required, or if they are requested should concerns be reported to an awarding body. They are 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. Ultimate responsibility for the Conflict of Interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Head of Centre.

January 2025

Deborah Thackeray

Exams Officer

Annexe 1

Conflict of Interest log (June 2025 Exam Series)

Date recorded	Staff name & job title(s)/role(s)	Conflict of interest (COI)	Measures taken/protocols in place to mitigate any potential risk to the integrity of the qualifications affected

The records may be inspected by a JCQ Centre Inspector and/or awarding body staff. They might be requested in the event of concerns being reported to an awarding body. The records must 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.

Annexe 2

Declaration of Interest form 2024/25

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 **2024/25** 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