



Davenant Foundation School

Conflict of Interest Policy 2020-2021

Last Reviewed: April 2021

Next Review: April 2022

This policy has been reviewed and to the best of our knowledge, we do not feel that it impacts on any group or individuals' equality rights within our school community

POLICY DETAILS

Policy Name	Conflict of Interest (Exams)	Committee Responsible	Curriculum and Standards
Status	Discretionary	Committee Person i/c	Mr A Thorne
Produced by	Mr Thorne	First Agreed	
Date Produced	April 2021	Last Review Date	April 2021
References		Next Review Date	April 2022

1. Introduction

1.1. The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest concerning **examinations procedures**.

- It is the responsibility of everyone in the centre to read, understand and implement this policy.
- This exam policy will be reviewed every year.
- This exam policy will be reviewed by the Headteacher, Deputy Head, Senior Leadership Group, Examinations Officer and the Governors.

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 roles and responsibilities for managing conflict of interest at all levels.

1.2. This policy particularly applies to all staff and other individuals who interact with the work of an awarding body. This includes individuals involved with all aspects of the creation, marketing, sales, distribution, marking or any other activity connected with an awarding body.

1.3. 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.

2. Definition of a Conflict of Interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties.

Conflicts of interest can arise in a variety of circumstances in relation to awarding organisation activity, for example:

- When an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation.
- When an individual has personal interests that conflict with his or her professional position.

A conflict of interest at an exam centre occurs where a member of the centre 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 Davenant Foundation School or any other centre.

The term '**Related People**' is defined as close friends or relatives 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, church associates, external tutees 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. A Conflict of Interest may also occur if any member of the centre's staff is entered for an examination/assessment.

3. Roles and Responsibilities

3.1. All relevant staff and other individuals have a responsibility to be aware of the potential for a conflict of interest. It is likely that individuals working closely with an awarding organisation will encounter potential conflicts of interest from time to time.

3.2. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards of, or public confidence in, regulated units and qualifications.

3.3. The ultimate responsibility for the management of potential and actual conflicts of interests rests with the Head Teacher who is Head of Centre.

3.4. Senior Leaders are responsible for communicating the conflict of interest policy to all relevant individuals within the school.

3.5. Any potential conflict of interest must, in the first instance, be approved by the Headteacher.

3.6. The Head Teacher is responsible for risk assessing all actual or potential conflict of interest.

3.7. The Head Teacher is responsible for deciding when and how matters relating to potential or actual conflicts of interest will be escalated within the School.

3.8. Where the conflict of interest refers to the Head Teacher, the Chair of Governors will assume the responsibilities outlined above.

3.9. All relevant individuals will be required to provide Conflict of Interest declaration annually.

3.10. Where there is a potential or actual conflict of interest, these must be documented. The Head Teacher must either resolve the issue or, for issues that are not resolvable (for example, staff who are also external verifiers) report the issue to the Governors.

3.11. The Chair of Governors will investigate the issue and make a decision on the appropriate course of action.

3.12. Every individual within the school community has responsibility for ensuring that they are familiar with the conflict of Interest policy and any guidelines. The most important feature of the Policy is the requirement that an individual will disclose any activity if there is any doubt about whether or not it represents a conflict of interest. Where an individual is unsure, they must report it and the Head Teacher will make a decision as to whether or not a conflict exists.

3.13. Any individual considering taking on additional paid work that relates to the assessment and verification of students work must seek the Head Teacher's agreement beforehand, as stipulated in their contract of employment. An individual must not take on any such activities that could be deemed to compete or conflict with School activities.

4. Informing awarding bodies of conflict of interest

- 4.1. Individual awarding body/bodies must be informed where, for one or more of their specifications:
- any member of staff is entered for an examination or assessment;
 - any member of staff (including invigilators), with access to the centre's secure storage facility, has 'Related People' sitting examinations, whether that is at Davenant Foundation School exam centre or elsewhere. This includes a member of staff who has access to both confidential assessment materials and is also entered for an examination at another centre;
 - any members of staff are involved in making **assessment decisions** for 'Related People' at the centre where there are centre marked and externally moderated components/units. (Awarding bodies are normally informed of the candidates affected at the point when centre assessed marks are submitted.) This includes the 2021 TAG process.

5. Conflict of Interest data collection

5.1 In the first instance all staff have to indicate if they think there is a conflict of interest based on the definitions of the policy. This is done using a Google form with the collated data being reviewed by the Head of Centre (Head Teacher). A follow up form for more information is then sent to all relevant staff.

5.2 Following the Declaration the Head Teacher and in line with policy, in conjunction with the senior management will risk assess and put in place mitigation to avoid any conflict of interest. This information will be recorded in what is defined as **Conflict of Interest log**

5.3 All conflict of interest data is kept in strict confidence in line with the School's GDPR policy.

Declaration of Interest form 2020/21

To comply with the regulations, the centre is required to manage Conflicts of Interest and inform the relevant awarding body/bodies for any of their qualifications 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)	
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 **2020/2021** 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 a member of staff and I am teaching and preparing a member of my family or close friend/member of their immediate family 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 or close friend/member of their immediate family 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

Signature	
Date	

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 Conflict 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