

Fair Ways Schools (Swanwick, Fort Wallington and GLADE) Conflict of Interest (Exams) Policy

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Fair Ways Vision, Mission and Values (2024)

Our vision

To build a community that changes lives, makes a difference to society and leaves a legacy greater than ourselves and our contributions.

Our mission

To grow a compassionate, resilient, and trauma-informed community, that embraces learning, so that we improve the lives and outcomes of individuals.

Our values

Our values form the heart of the work we do, defined by Fair Ways people, for Fair Ways people. These are the values by which we operate, by which we are governed, and to which we are held accountable.

We therefore expect every individual within Fair Ways to *play their part*:

P ROFESSIONAL	A CCEPTING	R EFLECTIVE	T RANSSPARENT
<ul style="list-style-type: none"> We do what we say we will. We approach challenges with optimism and enthusiasm. We don't judge, we notice. We put the needs of the service before our own personal gains. 	<ul style="list-style-type: none"> We don't give up on people. We value all individuals and are willing to challenge them. We embrace each other's differences as much as our similarities. We accept responsibility for our actions. 	<ul style="list-style-type: none"> We give feedback, we invite feedback, we listen to feedback. We look inward before we look outward. We learn as much from our mistakes as from our successes. We listen to each other, learn from each other and grow together. 	<ul style="list-style-type: none"> We are always willing to explain why. We have the courage to be open and honest. We earn trust through our transparency. We live by our values even when no-one is watching.

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1 Introduction

- 1.1 Fair Ways Education is required to have in place a Conflict of Interest policy that enables us to identify, manage and mitigate any potential conflict of interest. All staff and other individuals related to the school have a responsibility to be aware of the potential for a conflict of interest.

2 Purpose

- 2.1 The purpose of this policy is to provide guidance to staff and any other relevant individuals on handling possible conflicts of interest that may arise as a result of their roles as teachers, invigilators, and assessment/exam-related administrators. The policy is designed to protect the integrity of our qualifications and the assessment process. It applies to all staff or other individuals whenever they interact or potentially interact with any of the school assessment/exam related functions. 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 Fair Ways's role in delivering courses.
- 2.2 This policy:
- Defines what is meant by 'conflict of interest' in this context
 - Describes the issues of conflict of interest in the context of working for Fair Ways in an assessment/exam related function or with, or for, an awarding organisation.
 - Sets out which conflicts can be managed and how they should be managed, and those which are considered unmanageable and therefore cannot be allowed.
 - Illustrates potential conflict of interest situations, some of which are not obvious

3 Scope of Policy

- 3.1 This policy applies to staff and other individuals who interact or potentially interact with the assessment related work/examinations of the school. This includes individuals involved with all aspects of devising, setting, marking, administering, invigilating, internally quality assuring or any other activity connected with the assessment of candidates and associated supporting resources and services.
- 3.2 The individuals falling within the scope of this policy include all staff employed by Fair Ways on a full-time, part-time, or casual basis.

4 Definition of 'conflict of interest'

- 4.1 A conflict of interest is a situation in which an individual has competing interests or loyalties, which could compromise or appear to compromise their decisions if it is not properly managed. In this context there is a potential conflict of interest when a member of staff has friends or relatives taking assessments or examinations, at this school or elsewhere. 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 Fair Ways or another centre.
- 4.2 The Joint Council for Qualifications (JCQ) use the term 'Related People' to cover close friends and relatives. '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.
- 4.3 A conflict of interest also occurs if any member of staff is entered for an examination or assessment at the school or elsewhere.

5 Principles

The school will:

- Review its processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved
- 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, family or other 'Related People' sitting examinations
- Ensure that no member of staff is asked to assess, invigilate or internally verify the work of a student who is a family member, other relative or close friend
- Ensure that no member of staff uses their role within Fair Ways to compromise the security and confidentiality of all assessment documents including examination papers
- Ensure that no member of staff makes live assessment materials available to individuals, whether or not students of Fair Ways, when not specifically tasked with assessing them as part of a timetabled activity

6 Responsibilities

- 6.1 Line managers are responsible for ensuring that all new staff are aware of, and understand, the Conflict of Information policy. Any day-to-day concerns identified by an individual should be raised with their line manager
- 6.2 The Exams Office will ensure that all JCQ requirements are adhered to and will maintain appropriate records accordingly (see annexe 1)
- 6.3 All individuals will be required annually to read and understand the Conflict of Interest Policy.
- 6.4 The most important feature of the policy is the requirement that individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest. 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 Fair Ways or another centre. Prior to each examination series, all staff and other relevant individuals must inform the exams office of any 'Related People' being entered for examinations at Fair Ways and also at any other examination centre, during that exam series, if there is a potential conflict of interest. They do this by completing the form in annexe 2. Communication should be directly to the Examinations Manager who will liaise with the Assistant Principal (Students). Disclosures should be made as soon as potential or actual conflict is discovered.
- 6.5 Any concerns that the individual feels are urgent should be communicated immediately to the Head of Centre (Students) and may be done so in confidence. It is an individual's right to raise concerns relating to the conflict of interest directly with the senior leadership team and to receive a response to their concerns.

7 Equality impact and monitoring the policy and procedure

- 7.1 In monitoring the impact of this policy and procedure, the school will have due regard to its Equality and Diversity Policy and its single Equality Duty. It will consider any concerns raised or complaints received, based on student and staff data, feedback, surveys and/or professional judgement. If you have a question or a suggestion to improve the policy, please contact the Assistant Principal (Students).

Appendix A – Conflicts of Interest Log Template

CONFLICTS OF INTEREST LOG

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.

EXAMPLE ONLY

Conflict of interest (COI)	Measures taken/protocols in place to mitigate any potential risk to the integrity of the qualifications affected
<p>(As a last resort where unable to find another centre) Taking a qualification(s) at this centre which includes an internally assessed component/unit</p> <p><input type="checkbox"/> COI declared to relevant awarding body before the published deadline for entries (for each affected examination series)</p>	<p>[Insert as example, To:</p> <ul style="list-style-type: none"> prevent the member of centre staff having access to confidential examination/assessment materials prior to exam(s)/assessment(s) brief other relevant centre staff on maintaining the integrity and confidentiality of exam/assessment materials ensure the member of centre staff is treated in the same way as any other candidate entered for that qualification, does not have access to examination materials and does not receive any preferential treatment <p>the arrangements below are in place:]</p> <p>[Insert as bullet points the specific measures taken/protocols in place in the centre to achieve the above]</p>
<p>Teaching and preparing a member of 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</p> <p><input type="checkbox"/> COI declared to relevant awarding body before the published deadline for entries (for each affected examination series)</p>	<p>[Insert as example, To:</p> <ul style="list-style-type: none"> make every effort to avoid situations where a candidate is assessed by a person who has a close personal relationship with the candidate ensure the member of centre staff is not solely involved in making assessment decisions for the affected candidate for any internally assessed component/unit ensure the marked work will be submitted for moderation whether or not it is part of the moderation sample the arrangements below are in place:] <p>[Insert as bullet points the specific measures taken/protocols in place in the centre to achieve the above]</p>
<p>A member of exams office staff and has a member of 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</p>	<p>[Insert as example, To:</p> <ul style="list-style-type: none"> ensure that the member of exams office staff does not have unaccompanied access to confidential examination materials (for example, question papers, pre-release materials, answer scripts etc. ensure that another person is present for particular administrative arrangements relating to the candidate's exams/assessments <p>the arrangements below are in place:]</p> <p>[Insert as bullet points the specific measures taken/protocols in place in the centre to achieve the above]</p>
<p>Taking a qualification at this centre which does not include internally assessed components/units</p>	<p>[Insert as example, To:</p> <ul style="list-style-type: none"> prevent the member of centre staff having access to confidential examination materials prior to exam(s) brief other relevant centre staff on maintaining the integrity and confidentiality of examination materials ensure the member of centre staff is treated in the same way as any other candidate entered for that qualification, does not have access to examination materials and does not receive any preferential treatment <p>the arrangements below are in place:]</p> <p>[Insert as bullet points the specific measures taken/protocols in place in the centre to achieve the above]</p>
<p>Taking a qualification at another centre</p>	<p>[Insert as example, To ensure the member of centre staff does not have access to confidential examination materials for the same awarding body qualification if this is delivered in the centre, the arrangements below are in place:]</p> <p>[Insert as bullet points the specific measures taken/protocols in place in the centre to achieve the above]</p>

Appendix B – Declaration of Interest Form Template

DECLARATION OF INTEREST FORM

To comply with the regulations, the centre is required to manage conflicts of interest and inform the relevant awarding body/bodies (before 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 own 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 **xxxxxxx** 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 exams office 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 [insert] by [insert]

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.

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

