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Together we grow and shine

## Fountain Head House School EXAMS - Conflict of Interest Policy

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## Context

Fountain Head House School (FHHS) is a co-educational school for up to 80 pupils in the age range 4 to 16 years, for pupils with identified Special Educational Need and Disability (SEND) through their EHCP.

It is recognised by external awarding organisations and internally that there is a requirement to ensure all qualifications offered by FHHS have been fairly and legitimately delivered, assessed and processed.

## Aims

This policy aims to ensure that

- professional obligations and expected best practice are followed, as well as providing guidance in dealing with any unavoidable conflicts of interest, as they may arise
- Fountain Head House School and all its employees do not become involved in any impropriety, or even the appearance of any impropriety

## Declaration of Interests

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 these not properly managed.

In this context there is a potential for a conflict of interest when a member of staff has friends or relatives taking assessments or examinations, at the school or elsewhere.

A conflict of interest may occur when a 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 the school or elsewhere.

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.

A conflict of interest also occurs if any member of staff is entered for an examination or assessment at the school or elsewhere.

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 the college and also at any other examination centre (if applicable), 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 Exams Officer who will liaise with the Headteacher. Disclosures should be made as soon as potential or actual conflict is discovered.

## 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 pupil who is a family member, other relative or close friend
- Ensure that no member of staff uses their role within the school 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 pupils of the college, when not specifically tasked with assessing them as part of a timetabled activity

## Responsibilities

### The Exams Officer is responsible for

- ensuring that all new staff are aware of, and understand, the Conflict of Information policy
- ensuring that all JCQ requirements are adhered to and will maintain appropriate records accordingly (see **annexe 1**)
- ensuring that members of staff involved in the process of exams and qualifications, read the EXAMS – Conflict of Interest Policy and acknowledge that they have read, understood and will follow the policy
- logging any disclosed conflicts of interest and state how these will be mitigated
- logging any concerns regarding a possible conflict of interest and state how these have been followed up and resolved

### Staff members are responsible for

- inform the exams officer or a member of SLT if any day-to-day concerns are identified
- reading the EXAMS – Conflict of Interest Policy and acknowledge that they have read, understood and will follow the policy (this is overseen by the Exams Officer)
- disclosing any aspect which might represent a conflict of interest

### Note

Any concerns that the individual feels are urgent should be communicated immediately to the Exams Officer 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.

## Equality impact

In monitoring the impact of this policy and procedure, the school will have due regard to its Equality, Diversity and Inclusion Policy. It will consider any concerns raised or complaints received, based on pupil and staff data, feedback and/or professional judgement.

## **Links to other policies**

FHHS – Careers Education, Information, Advice and Guidance Policy

FHHS – Exams – Qualifications Appeals Policy

FHHS – Exams Malpractice Policy

FHHS – Equality, Diversity and Inclusion Policy

## Appendix 1 – Conflicts of Interest Log Template

### CONFLICTS OF INTEREST LOG 2023/24

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.

## Appendix 2 – Declaration of Interest Form Template

### DECLARATION OF INTEREST FORM 2023/24

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:
- **the** exams officer 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		You 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 at this centre which includes and internally assessed component/unit

Qualifications I am taking	Awarding organisation	Qualification type	Specification (subject)

☐

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	Please tick:    This centre?                      Another entering centre		
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 organisation	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 the Exams Officer.

The declaration(s) you have provided will be used to inform the relevant awarding organisation(s) (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 the Examination Officers use only**

Date	Action
	Completed declaration form received
	Declaration(s) recorded on Conflicts of Interest log
	Awarding organisation informed of specific Conflicts of Interest
	Staff member informed of measures/protocols in place to manage the risk represented by the Conflict of Interest