

Conflict of Interest Policy 2023–24

For the attention of: All Staff
Produced by: Group Head of Exams
Approved by: SLT
Date of publication: December 2023
Date of next review: August 2024





Vision, Purpose & Values

Our Vision

Our students will be recognised locally & nationally for their positive impact on the communities and industries in which they choose to work.

Our Purpose

To inspire our students to gain the skills, knowledge and behaviours they need to be resilient and thrive in an ever-changing world.

Our Values

Excellence: A culture of creativity, high expectations, ambition and aspiration

Respect: Showing fairness, courtesy and mutual respect to each other and our environment

Integrity: Honesty, openness and trust at the heart of College life

Diversity: Celebrating diversity and inclusivity as a key to our success

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1. Key Staff Involved in the Plan

Role	Names
Head of Centre	Gillian May
Principal	Anne Entwistle & Amanda Down
Group Exams Manager	Fatima Rana
Exams Office Staff	Kofil Chowdhury, Amanda Flemington, Simmi Pawar, Kiran Basra, Claire Burt, Harriet Wigmore-Welsh, Jalisa Ogundelu, Isra Khan, Roberto Cura and Karan Sidhar

2. Purpose of the Plan

The purpose of this policy is to provide guidance to relevant individuals on handling conflicts of interest that may arise at the The Windsor Forest Colleges Group (TWFCG) as training and education provider, tutor, assessor, moderator, exams staff including invigilators of accredited units and qualifications.

'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.'

[Quote taken directly JQC publication [General regulations for approved centres](#)]

This policy defines what is meant by conflict of interest and outlines staff roles and responsibilities in relation to the process of managing conflict of interest. It is the responsibility of each individual to recognise situations, in which they have a conflict of interest, or might reasonably be seen by others to have a conflict; to disclose and take such further steps as may be appropriate and set out in more detail in the procedure below.

3. Definition of 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 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 centre staff is entered for an examination/assessment.

- **Definition of '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.

4. Process for Managing Conflict of Interest

Identify Staff

New Staff - Employment application forms include a question asking potential staff to declare if they are related to or are a friend of a student and/or anyone employed at TWFCG.

Current Staff - All staff must declare whether they have 'related people' entered for an examination/assessment at this centre - A 'Declaration of Interest Form' is circulated to all staff at the start of the academic year and once completed returned to the Exams Manager

Record of Conflicts

A 'Conflict of Interest Log' is compiled and managed by the Group Exams Manager. The log records the steps taken to manage the risk represented by any Conflict of Interest.

Awarding organisations are informed where, for one or more of their specifications:

- The member of staff is entered for an examination or assessment
- The member of staff (including invigilators), with access to the centre's secure storage facility, has 'Related People' sitting examinations, whether that is at this 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

- The member of staff are involved in making assessment decisions for 'Related People' at the centre where there are centre marked and externally moderated components/units.

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

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>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> <ul style="list-style-type: none"> • permission sought from AO for staff member to complete qualification at the centre • all units will be internally verified • deadlines will be set for all candidates to adhere to and restrictions set for failed deadlines • rules and regulations will be followed as they would for all candidates • all dated exam/assessment material will be held in secure storage by the exam team and only passed to the assessor at the allotted time • work will be submitted for external verification whether on sample list or not
<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>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 <p>the arrangements below are in place:</p> <ul style="list-style-type: none"> • work will be assessed by another member of the department to ensure impartiality • all work to be internally verified by a senior member of the department • liaise with the external verifier to ensure they include the work in the moderated sample

<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>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> <ul style="list-style-type: none"> • staff member will be accompanied by another member of the exams staff when requiring access to secure storage • designated member of the team will be responsible for pre-release materials, producing coloured paper copies on the day of the exam, preparing papers for alternative rooming students • designated member of the team to be responsible for logging of papers • the affected staff member will not be able to invigilate in the same room as their family member
<p>(As a last resort where unable to find another centre) Taking a qualification at this centre which does not include internally assessed components/units</p> <p>COI declared to relevant awarding body before the published deadline for entries (for each affected examination series)</p>	<p>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> <ul style="list-style-type: none"> • all exam materials will be held in secure storage and only accessed by the exams team • invigilation for exams will be conducted by external invigilators/exams team members • all exams will be booked by the exams team • all students will have access arrangements in place where applicable • everyone taking the externally assessed units will sit at the same time in the same location (alternative rooming guidelines followed as applicable)
<p>Taking a qualification at another centre</p>	<p>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> <ul style="list-style-type: none"> • Only exams team/key holders have access to confidential examination materials • If an exams team member is the affected staff member, they will not have access to any materials during relevant exam series'