



**The Westminster  
School**


*Safe, Happy and learning Together*

[www.thewestminsterschool.co.uk](http://www.thewestminsterschool.co.uk)

**2021/2022**

# **Conflict of Interest Policy**

Building foundations and providing opportunities to create confident, aspirational, and independent members of our community.

Approved by Governing Body on:	<b>20 January 2022</b>
Signed by Chair of Governors:	
Head Teacher:	<b>O M Flowers</b>
Lead Personnel:	<b>O M Flowers</b>
Date of Review:	<b>20 January 2024</b>

The Westminster School expects anyone employed, engaged by or working on behalf of the organisation to conduct themselves with or exhibit:

- integrity
- selflessness
- accountability
- openness
- honesty
- objectivity
- impartiality, and
- leadership.

### **Purpose of the Policy**

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, support staff invigilators, and assessment/exam-related administrators. This policy applies to all staff or other individuals whenever they interact or potentially interact with any of the school assessment/exam related functions.

This policy:

- Defines what is meant by conflict of interest
- Describes the role of conflict of interest in the context of working for the school in an assessment/exam related function
- 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

The most important feature of the policy is the instruction that staff and relevant individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest.

The policy describes how and when such disclosures should be made, that is, as soon as potential or actual conflict is discovered. This should be done by completion of a report at the time (i.e. before activity is carried out). The policy describes the procedures that should be followed and how to handle potential conflicts of interest.

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 verifying or any other activity connected with the assessment of candidates and associated supporting resources and services.

The individuals falling within the scope of this policy include full-time, part-time, prorated and support staff of the school and any associate staff including external examiners. The content of the policy cannot cover every potential conflict and must be interpreted in the light of the particular circumstances of each conflict.

### **What is a Conflict of Interest?**

A simple definition of 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, for example:

- An individual whose personal interests conflict with his/her professional position
- An individual scheduled to assess, invigilate or internally verify the work of friends, relatives

**Implications of a breach of a conflict of interest could constitute the following:**

- 1) Breach of terms or contract of employment
- 2) Breach of Teacher Standards
- 3) Breach of Professional Standards
- 4) Gross misconduct

**Roles, Responsibilities and Associated Procedures to be followed in the Event of an Actual or Perceived of Interest**

- All relevant staff have a responsibility to be aware of the potential for a conflict of interest. It is possible that staff working in any assessment/exam related role might encounter potential conflicts of interest from time to time. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on standards of, or public confidence in the school's educational provision. Staff can find themselves in potential conflicts of interest situations because they are not clear what the correct, auditable processes and procedures are.
- The Conflict of Interest policy is a requirement of the induction of all new teachers, invigilators and assessment/examination related support staff and staff asked annually of any potential conflicts of interest (as and when the situation arises, teachers, invigilators and support staff must notify the school of any students that are at the school who are family members, other relatives or close friends). The Head Teacher oversees the induction of all new staff.
- Any day-to-day concerns identified by an individual should be raised with their line manager in the first instance. This will be the member of staff who is performance managing them (see documentation issued to staff at the beginning of the academic year)
- Where there is a notified potential conflict of interest for an individual, the individual and line manager must document this carefully, together with those activities that must be avoided to prevent the school being brought into disrepute. A declaration of conflict of interest form should be signed by both the individual and the line manager, brought to the attention of the Head Teacher (Mr Oliver Flowers) where documents will be retained for audit purposes
- Any concerns that the individual feels are urgent should be communicated immediately to the Head Teacher and may be done so in confidence. It is an individual's right to raise concerns relating the conflict of interest directly with the Headteacher.
- If a teaching member of staff is involved in any way with the development of a secure assessment for either internal or national use, he/she cannot make use of the knowledge of that assessment in any teaching or learning activity
- Teachers, invigilators and assessment/exam-related administrators do not take responsibility to ensure the security and confidentiality of all assessment documents including examination papers
- Learning and teaching materials are based on live examination of other assessment materials (although they can make use of past examination of other assessment materials)
- A 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

- A member of staff makes assessment materials available to individuals, whether or not students of the school, when not specifically tasked with assessing them as part of a timetabled activity

The accreditations that may relate to this are:

- ASDAN Qualifications
- Princes Trust Qualifications
- NCFE Qualifications (functional skills)
- Open College Network West Midlands Qualification