



INDEPENDENT SCHOOL

Conflict of Interest Policy

Policy Owner: Sandeep Athwal

Full Name	Position	Signature	Date	Review Cycle
Sandeep Athwal	Director		08.01.27	Annual



Issue and review

The date of issue of this policy is November 2023. This policy will be reviewed annually

Definition of Conflicts of Interest

A conflict of interest (as defined in the General Conditions of Recognition August 2018 published by Ofqual) exists in relation to an awarding organisation where:

- (a) Its interests in any activity undertaken by it, on its behalf or by a member of its Group have the potential to lead it to act contrary to its interests of the development, delivery and award of qualifications in accordance with its Conditions of Recognition
- (b) A person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisation's Conditions of Recognition, or
- (c) An informed and reasonable observer would conclude that either of these situations was the case.

Who does this policy apply to?

Conflicts of interest can take many forms and apply not only to Directors & staff but to examiners and teachers. School of Coding takes responsibility for ensuring that it identifies and manages potential conflicts of interest where they apply to the Directors, staff and examiners. Teachers take responsibility for identifying and managing potential conflicts of interest, reporting these regularly to School of Coding who is responsible for monitoring them.



How School of Coding identifies conflicts of interest

Conflicts of interest are identified through:

- (a) The recruitment process for UKAdance staff and examiners.
- (b) Declarations of conflicts of interest made by:
 - School of Coding Director
 - School of Coding staff
 - Examiners
- (c) The monitoring of conflicts of interest:
 - By School of Coding for Directors and members of staff
 - By School of Coding directors in relation to examiners

Examples of potential conflicts of interest

Potential conflicts of interest could include:

- An individual entering into a financial or operational agreement with an organisation or individual in which they have a vested interest.
- The interests of one job held by an individual contradicts another job held by that same individual (e.g. a person working for two competing organisations or in two conflicting roles within one organisation (e.g. Assessor and Internal Verifier)).
- A partner, child, or other close relative of an individual is employed (or applies for employment) by an organisation.
- An examiner carrying out assessment has personal links with the individuals they are assessing (known as interests in assessment).
- Goods or services are purchased from a relative of an individual or an organisation controlled by a relative.
- Gifts are accepted from others to promote their interests within the organisation.

Conflicts in relation to confidential material

School of Coding sets out obligations in its contractual arrangements for staff and third parties who have access to confidential assessment information which may arise from other activities they may carry out. These contractual arrangements require staff and third parties who have, or have had, access to confidential assessment information through the assessment development process (including quality assurance) to provide details of –

- all instances in which such a person is, or has been, a teacher for the relevant qualification, or is employed by a teacher at whose school that qualification is taught or delivered (even if that person does not themselves teach or deliver the qualification); and all other conflicts of interest including personal conflicts such as, for example:
- where a child, sibling or other close family member is due to take the assessment in relation to which the person has confidential assessment information, and where a partner or other close family member is teaching, or is due to teach, the relevant qualification.

Managing potential conflicts of interest

Once a potential conflict is identified via an annual declaration or through periodic monitoring of conflicts of interest, School of Coding will:

- Log the potential conflict
- Decide whether the potential conflict:
 - Does not pose a risk
 - Poses a risk if not managed appropriately
 - Poses a significant risk
- Escalate any conflicts posing a risk to the Quality Committee for a decision and action

In all cases, School of Coding seeks to mitigate any potential conflicts before they pose a risk to the organisation or cause an Adverse Effect.

School of Coding sets a 5-year limit on potential conflicts of interest. Therefore, any historical personal or professional links that an individual has with a centre, individual or organisation which have ended over 5 years from the point of declaration would not be considered as a potential conflict unless the individual declares that personal and/or professional links are still valid and may have an impact.

In cases where the potential conflict does not currently pose a risk, the conflict will be noted in the log and monitored over time to assess whether any changes to individual job roles or responsibilities might pose a risk in the future.

Examples of this type of conflict may include:

- Where a contractor works for another awarding organisation but not in the same capacity or sector



- Where a member of staff has family members who may be undertaking School of Coding examinations but does not have responsibility for any areas of School of Coding operations that might put them in conflict
- Where an examiner declares a personal or professional relationship with an individual candidate, teacher or centre – this would involve reallocating the examiner to another examination session or centre.
- Where a School of Coding member of staff knows a School of Coding student on a personal level – this would involve allocating the administration for that candidate's examination to another member of staff.

In cases where the potential conflict poses significant risks and cannot effectively be managed by redeployment or by other form of mitigation, the conflict will be noted in the log and flagged to the Quality Committee to agree actions.

Monitoring conflicts of interest

As well as the expectation that conflicts will be declared on an annual or other agreed basis by:

- Directors
- Staff
- Contractors (including examiners)
- Centres
- Examination venues
- Monitoring of examination venues by School of Coding
- Checks with Directors, staff and contractors that any changes to roles and responsibilities do not indicate a potential conflict