



# Catherine School of London

## Conflict of Interest Policy

**Date:** 15 May 2025

**Review Date:** Annually or as required

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### 1. Policy Statement

Catherine School of London is committed to ensuring that all assessments, decisions, and processes are conducted with **honesty, fairness, and transparency**. This policy sets out our approach to identifying, disclosing, and managing **conflicts of interest** to protect the integrity of our operations and the qualifications we deliver.

We recognise that conflicts of interest—whether actual, perceived, or potential—can undermine confidence in our organisation, assessments, and quality assurance systems. All staff, contractors, assessors, internal quality assurers (IQAs), and other stakeholders are required to act in the best interest of the centre and its learners at all times.

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### 2. Purpose

This policy aims to:

- Define what constitutes a conflict of interest
- Ensure that conflicts are disclosed, documented, and managed appropriately
- Maintain the integrity and credibility of our qualifications and operations
- Comply with the requirements of awarding organisations and regulatory bodies (e.g. Ofqual)

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### 3. Scope

This policy applies to:

- All staff, including full-time, part-time, and freelance employees
- Assessors, IQAs, tutors, administrators, and support staff
- Board members and senior management
- Contractors and external consultants
- Any person involved in the design, delivery, assessment, internal verification, or administration of qualifications

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## 4. Definition of Conflict of Interest

A **conflict of interest** occurs when an individual's personal, professional, or financial interests could compromise—or appear to compromise—their objectivity, judgement, or ability to act in the best interests of the centre or its learners.

Conflicts may be:

Type	Example
<b>Actual</b>	A tutor is assigned to assess a close relative
<b>Potential</b>	A staff member has applied for a position with an awarding body that regulates their current work
<b>Perceived</b>	A learner believes an assessor is biased due to a personal relationship

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## 5. Examples of Conflicts of Interest

- Assessing or internally verifying the work of a **family member, friend, or colleague**
  - Having a **financial interest** in the outcome of an assessment
  - Delivering training and also acting as an **external verifier or consultant**
  - Making decisions that may benefit **one group of learners** over others
  - Participating in the recruitment of someone with whom you have a personal relationship
  - Receiving gifts or incentives that could influence decisions
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## 6. Staff Responsibilities

All individuals involved with Catherine School of London are required to:

- **Declare any actual, potential, or perceived conflict of interest** at the earliest opportunity
- Avoid actions or decisions that could lead to unfair advantage or bias
- Cooperate fully with any measures put in place to mitigate the conflict
- Complete a **Conflict of Interest Declaration Form** annually and update it as necessary

Failure to disclose a conflict of interest may result in disciplinary action.

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## 7. Centre Responsibilities

Catherine School of London will:

- Maintain a **Conflict of Interest Register**
  - Review all declared conflicts and determine appropriate mitigation actions
  - Ensure assessors and IQAs are not assigned to learners where a conflict exists
  - Train staff on recognising and managing conflicts of interest
  - Monitor compliance as part of internal quality assurance processes
  - Notify the **awarding body** of any significant conflicts that could affect assessment decisions or centre integrity
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## 8. Managing Conflicts of Interest

When a conflict is declared or identified, the centre will:

1. **Assess the nature and severity** of the conflict
2. Decide whether the conflict can be **managed, mitigated, or avoided**
3. Put in place appropriate actions, such as:
  - Reassigning assessment duties
  - Independent oversight or second-marking
  - Temporary or permanent removal from specific duties

All decisions will be documented and retained on the Conflict of Interest Register.

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## 9. Awarding Body Notification

In line with regulatory requirements, Catherine School of London will report significant conflicts of interest to the relevant awarding body where:

- There is a risk to the integrity of an assessment
  - An individual's impartiality may be questioned
  - The awarding body's compliance could be compromised
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## 10. Confidentiality

All conflict of interest declarations and investigations will be handled sensitively and confidentially. Information will only be shared with those who need to know to manage the conflict effectively.

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## **11. Monitoring and Review**

- This policy will be reviewed **annually**, or sooner if regulatory guidance or organisational structure changes
  - The Conflict of Interest Register will be reviewed regularly by the Centre Manager
  - Trends or recurring issues will inform staff training and procedural updates
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## **12. Related Policies and Documents**

- Assessment and Quality Assurance Policy
  - Academic Misconduct and Plagiarism Policy
  - Data Protection Policy
  - Staff Code of Conduct
  - Conflict of Interest Declaration Form
  - Register of Interests
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## **13. Policy Approval**

This policy is approved by:

**Tahir Khan/ Director**

**Date:** 15 May 2025

# Conflict of Interest Declaration Form

## Purpose:

This form must be completed by all staff, contractors, assessors, internal quality assurers (IQAs), and any individual involved in the delivery, assessment, verification, or administration of qualifications at Catherine School of London.

It allows the centre to identify and manage any actual, potential, or perceived conflicts of interest in line with its **Conflict of Interest Policy**.

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## SECTION 1: Personal Details

### Full Name

Job Role / Title

Department / Programme

Line Manager

Email Address

Date

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## SECTION 2: Declaration of Conflict(s) of Interest

Please tick the relevant box and provide details below.

☐ **I declare that I have no actual, potential, or perceived conflict of interest** to report at this time.

☐ **I wish to declare the following conflict(s) of interest:**

### Nature of Conflict

### Description

Personal relationship (e.g. family, friend, or partner is a learner or colleague)

Financial interest (e.g. stake in a business benefiting from the centre's operations)

Dual roles (e.g. acting as assessor and IQA, or working with more than one centre)

External work (e.g. consultancy, freelance work for awarding bodies or competitors)

Other (please specify)

**Please provide full details of the conflict and suggested actions or mitigations:**

*(Continue on a separate sheet if needed)*

[Write here...]

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### SECTION 3: Signature

I confirm that the information provided above is accurate to the best of my knowledge. I understand that I must:

- Update this declaration if circumstances change
- Cooperate with any steps required to manage the declared conflict
- Abide by the centre's Conflict of Interest Policy

**Signature**

Date

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### SECTION 4: For Office Use Only (To Be Completed by Centre Manager / Designated Officer)

Action Taken	Description
Reviewed by	
Date Reviewed	
Risk Level (Low / Medium / High)	
Mitigation Action(s) Required	
Approved By	
Notes	

- ☒ Added to **Conflict of Interest Register**
  - ☒ Relevant staff informed (if applicable)
  - ☒ Awarding body notified (if required)
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**Return Completed Forms To:** [info@csl.ac](mailto:info@csl.ac)