

Conflict of Interest Policy and Procedure

Glendale International School | Governance and compliance

Policy owner	Jasmit Kang, Principal	Approval body	School Governor
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Version	1.1	Policy number	GIS COI 01
Applies to	Staff, governors, contractors and learners where relevant	Status	Approved

This policy protects the fairness, independence and credibility of school decisions, provision and assessment. Everyone covered by it must disclose an actual, potential or perceived conflict promptly. The school will assess the risk, record the decision and apply proportionate controls before the person takes part in the affected activity.

1 Purpose

The school will identify and manage interests that could improperly influence, or reasonably appear to influence, decisions about learners, assessment, internal quality assurance, purchasing, recruitment, complaints, appeals or the use of school resources.

2 Scope

This policy applies to governors, senior leaders, the Policy Coordinator, teachers, assessors, internal quality assurers, support staff, administrators, contractors, volunteers and any learner who participates in assessment, peer review, representation or decision-making. It applies whether the interest is financial, personal, professional, familial or otherwise.

3 Definitions

Term	Meaning
Actual conflict	A person's interest is currently affecting, or is capable of affecting, their impartiality.
Potential conflict	A person's interest could create a conflict if circumstances change.
Perceived conflict	A reasonable person could believe impartiality may be affected, even if no improper influence occurs.
Related person	A family member, close personal contact, business associate or organization with which the person has a material connection.

4 Principles

- Declare early: disclosure is required as soon as a conflict is known or reasonably suspected.
- Do not self-manage: the person concerned must not decide whether their own conflict is insignificant.
- Protect learners: decisions must remain fair, consistent and based on published criteria.
- Use proportionate controls: the school will remove, reduce or independently check the risk.
- Keep evidence: declarations, decisions, controls and reviews must be recorded securely.

- Report externally where required: matters affecting assessment, certification, legal compliance or school governance will be reported to the relevant organisation or authority without avoidable delay.

5 Examples of conflicts

- An assessor assesses, authenticates or signs off work belonging to a relative, close friend or a learner they tutor privately.
- An internal quality assurer samples or verifies their own assessment decisions, or those of a close relative or line manager where independence cannot be demonstrated.
- A member of staff accepts gifts, hospitality, payment or another benefit from a learner, parent, supplier or training provider.
- A staff member has a financial interest in a supplier, placement provider or service being recommended to the school or a learner.
- A staff member participates in a recruitment, disciplinary, complaints or appeals decision involving a related person.
- A learner participates in peer assessment or a panel decision involving a close friend or family member.
- A person uses confidential information, school resources or their role to secure a personal advantage.
- Targets, workload or performance measures create pressure to alter evidence, assessment decisions, attendance or achievement data.

6 Responsibilities

Role	Responsibility
Principal	Owns the policy, appoints an independent decision-maker where needed, approves high-risk controls and external reporting.
Policy Coordinator	Receives declarations, maintains the register, coordinates risk assessment and monitors controls.
Lead IQA	Safeguards independence in assessment and sampling and arranges reassignment or additional quality checks.
All covered persons	Identify, disclose and update interests; withdraw from decisions until authorised; cooperate with controls and review.
Learners and parents	Disclose relevant relationships or benefits that could affect assessment and raise concerns promptly.

7 Declaration procedure

1. Declare an interest before appointment or allocation to an affected activity, at the start of each academic year, and within two working days of becoming aware of any new or changed conflict.
2. Submit the declaration to the Policy Coordinator using the form in Appendix A. If the Coordinator is conflicted, submit it directly to the Principal. If the Principal is conflicted, submit it to the governing body or proprietor's nominated independent representative.
3. Do not assess, verify, approve, purchase, investigate, hear an appeal or access restricted information connected to the matter until a written management decision is issued.

- The receiver records the declaration in the Conflict of Interest Register and acknowledges it within two working days.

8 Assessment and management procedure

The designated decision-maker will assess the nature of the interest, the person's influence, the sensitivity and value of the decision, the risk to learners and assessment integrity, whether confidential information is involved, and how the situation would appear to a reasonable independent observer.

Risk	Typical response
Low	Record the interest; allow participation with disclosure, supervision or a second check.
Medium	Restrict access or decision-making; reassign part of the work; add independent sampling or approval; review at set points.
High	Remove the person from the activity; appoint an independent assessor, quality assurer or investigator; review affected decisions; notify senior leadership and any relevant external organisation where required.

The written decision will state the risk rating, controls, responsible person, start date, review date and whether a regulator, awarding organisation or other authority must be informed. The person concerned must confirm that they understand and will follow the controls.

9 Specific controls for assessment and IQA

- No assessor may make the sole assessment decision for a related person.
- No IQA may internally quality assure their own assessment decisions.
- Where reassignment is not practicable, the Principal and Lead IQA must approve documented independent scrutiny before any result or claim is released.
- Sampling plans must show how assessor and IQA independence has been protected.
- Any assessment already affected will be reviewed and, where necessary, reassessed by an independent competent person.

10 Undeclared or newly identified conflicts

- Report the concern immediately to the Policy Coordinator or Principal. A report made in good faith will be handled fairly and without retaliation.
- Secure relevant records and pause affected decisions or certification claims where integrity may be at risk.
- Appoint an impartial investigator with no connection to the matter.
- Determine whether a conflict existed, its impact, whether it was knowingly withheld and whether previous decisions require review.
- Apply corrective action. This may include reassignment, extra sampling, reassessment, withdrawal of a decision, training, recovery of gifts, supplier review, or action under staff, learner, disciplinary, malpractice or maladministration procedures.
- Report the matter without avoidable delay to any relevant regulator, awarding organisation or authority where assessment validity, certification, legal compliance or the integrity of a school programme may be affected.

11 Reporting to an awarding organisation or authority

Where a conflict may affect assessment, certification, centre approval, regulatory compliance or the integrity of a school programme, the school will use the following reporting procedure:

- The Policy Coordinator immediately informs the Principal and Lead IQA, records the concern and pauses any affected result, claim, approval or decision where necessary to protect integrity.



2. The Principal or delegated independent lead assesses the potential impact, identifies the learners, staff, units, decisions and dates involved, and checks the reporting requirements of the relevant awarding organisation or authority.
3. The Principal or authorised delegate reports the matter without avoidable delay through the organisation's official channel. The report will state the nature of the conflict, who and what may be affected, relevant dates, immediate containment, initial impact assessment, action taken and the school contact.
4. The school keeps the submitted report, reference number and correspondence; protects evidence; cooperates with enquiries; and implements any directions, sanctions or remedial actions required.
5. The authorised lead provides material updates and a closure report where requested, and records the final outcome and lessons learned in the Conflict of Interest Register.

12 Complaints and appeals

A person affected by a conflict-of-interest decision may request a review in writing within ten working days, stating the grounds and any supporting evidence. The Principal will appoint a reviewer who was not involved in the original decision. The school will normally acknowledge the request within two working days and issue an outcome within ten working days. If more time is required, the person will receive the reason and a revised date. Complaints follow the school complaints procedure. The school's internal process should normally be completed before an eligible matter is escalated externally.

13 Records confidentiality and retention

The Policy Coordinator will maintain a secure register containing declarations, risk assessments, decisions, controls, reviews, related correspondence and external reports. Access is limited to those who need it for governance, quality assurance, investigation or legal duties. Records connected with assessment or an appeal will be retained for at least three academic years after the matter closes, or longer where another applicable retention requirement, investigation or legal hold applies. The register is reviewed at least termly and this policy annually.

14 Training monitoring and review

Relevant staff will receive induction and periodic reminders on recognising and declaring conflicts. The Principal and Policy Coordinator will monitor declaration completion, overdue reviews, repeated themes and whether controls remain effective. Lessons from cases will inform training, allocation and quality assurance without disclosing personal information unnecessarily.

Appendix A Conflict of Interest Declaration Form

Field	Details
Name and role	
Date declared	
Activity, learner, decision or supplier concerned	
Nature of actual, potential or perceived conflict	
Related person or organisation, if applicable	
Relevant dates and financial or other interest	
Immediate action already taken	
Declaration: I confirm that the information is complete and I will not participate until authorised.	
Signature and date	

Management decision

Field	Decision
Decision-maker and role	
Risk rating and reasons	
Controls required	
Responsible person	
Effective and review dates	
External report required	
Outcome communicated on	
Signatures	