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1. Purpose

The purpose of this policy is to protect Pearson's integrity as a business and the integrity of their qualifications. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise as a result of Pearson's role as an awarding organisation.

This policy:

- defines what is meant by conflict of interest
- describes the role of conflict of interest in the context of working with, or for, an awarding organisation
- sets out the responsibilities for managing conflict of interest.

2. Scope of policy

2.1 This policy applies to all staff and other individuals who interact or potentially interact with the work of the awarding organisation. This includes individuals involved with the distribution, marking or any other activity connected with Pearson's qualifications, tests and assessments, and supporting resources and services.

2.2 The individuals falling within the scope of this policy include Pearson directors, employees, contractors, home workers, agency workers and any associate staff, including assessment associates, verifiers/examiners and freelance staff.

3. Definition of conflict of interest

3.1 A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

3.2 Conflicts of interest can arise in a variety of circumstances relating to awarding organisation activity, for example:

- Where the training delivery function and the awarding function rest within one umbrella organisation.
- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation.
- When an individual has interests that conflict with his or her professional position.
- Where someone works for or carries out work on Pearson's behalf, but may have personal interests – paid or unpaid – in another business which either uses Pearson products or services, or produces similar products.
- Where someone works for or carries out work on Pearson's behalf, who has friends or relatives taking Pearson assessments or examinations.

Conflict of Interest policy

Prepared by Head of Regulatory Monitoring and Risk. Authorised by Responsible Officer January

2017 Version 2.1

Ratified by PUKLT December 2016

Nov 2020 next review Nov 2022

4. Principles

4.1 As a school The Shrubberies will:

- Review our processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.
- Ensure that all members of staff declare any interest for friends or family sitting upcoming Pearson examinations.

5. Responsibilities

Senior Management and Governors

- 5.1 Managers in each department are responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility annually.
- 5.2 The school will review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.
- 5.3 Senior Management are required to give appropriate attention to potential or actual conflicts of interest.
- 5.4 Line managers are responsible for ensuring that all new staff receive conflict of interest training.
- 5.5 Any potential or actual conflict of interest must be documented. The line manager must either resolve the issue or, for issues that cannot be resolved at this level, report the issue to the Head of Centre. All records are required to be available for audit purposes.

All staff

- 5.6 School staff have responsibility for ensuring that they are familiar with the Conflict of Interest Policy, any guidelines and complete any required conflict of interest training.
- 5.7 This policy will be shared with school staff and governors.
- 5.8 **The most important feature of the policy is the requirement that an individual disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether or not it represents a conflict of interest it should be reported.**
- 5.9 The individual and line manager are equally responsible for ensuring that the issue is documented carefully.
- 5.10 An individual may wish to raise concerns relating to conflict of interest directly with the Head of Centre. This may be done in confidence and they are entitled to receive a response to their concerns.
- 5.11 Any staff member considering paid or unpaid work outside school should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this with their line manager first. The line manager should contact the Head of Centre if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with school's interests.
- 5.12 Prior to each examination series all staff and Governors must inform Pearson of any candidates being entered for its examinations and other assessments, who are family members, other relatives or

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friends. They are asked to declare this information by sending an email to head@shrubberies.gloucs.sch.uk

Responsible officer: monitoring and escalation

5.13 The Head of Centre is responsible for escalating reports of actual or potential conflicts of interest to an appropriate level and, when necessary, to the Governors and Pearson.

5.14 The Head of Centre will begin an investigation of any issues identified within 24 hours. A preliminary report will be made available to the senior manager concerned within 5 working days.

6 Advice and guidance

6.1 Any required guidance or interpretation on potential conflicts of interest should be sought from the Head of Centre or office of the Responsible Officer (conflictofinterest@pearson.com).

7 Regulatory references

7.1 UK regulators require all awarding organisations to establish and maintain their compliance with regulatory conditions and criteria. As part of this process, policies that relate to Pearson's status as an awarding organisation will reference any particular conditions and criteria that they address.

7.2 This policy addresses the following regulatory criteria and conditions:

Ofqual/CCEA Accreditation/Qualifications Wales General Conditions of Recognition June 2016
Conflict of Interest. Condition A4
SQA Accreditation Regulatory Principles (2014)
The awarding body shall have clearly defined and effective governance arrangements. Principle 1

8 Policy review date

8.1 Nov 2022

9 Useful links

Other Pearson regulatory policies:

- Marketing opportunities for third party publishers of endorsed resources policy
- Examiners as authors policy
- The endorsement of resources supporting Pearson qualifications policy
- Pearson Training for Regulated Qualifications Events Policy

The policies can be accessed here:

<http://qualifications.pearson.com/policies>

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Additionally, the *Public Interest Disclosure Act (Whistleblowing)* published by the JCQ on behalf of all member awarding organisations can be found here:

<http://www.jcq.org.uk/exams-office/malpractice/public-interest-disclosure-act-whistleblowing>

Please note that a separate *AA conflict of interest policy* is available for assessment associates via the Associate Management department.

The JCQ Agreed Code of Practice on Awarding Body/Publisher Relationships

<http://www.jcq.org.uk/exams-office/other-documents/agreed-code-of-practice-awarding-bodypublisherrelationships>

10 Useful contacts

10.1 For more information on Pearson qualifications and services please visit the website:
qualifications.pearson.com

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