



GRIFFIN COLLEGE LONDON
(INTERNATIONAL EXAMINATION BOARD)

Conflict of Interest Policy

TITLE**CONFLICTS OF INTEREST POLICY****Objective**

Griffin College London College London requires all of its employees, staff and third parties providing services to it to carry out their duties and activities associated with their work with the utmost integrity and professionalism, which includes the avoidance of situations giving rise to actual or potential conflicts of interest.

This policy sets out the expectations regarding real and potential conflicts of interest and the procedures to be followed in the event of a possible conflict of interest arising.

Scope

This policy applies to:

1. All Griffin College London employees on the payroll and all contractors, agency or temporary workers.
2. All consultants and other service providers, including examiners, engaged by Griffin College London in the development, delivery and examinations.

Aims of the Conflicts of Interest Policy

This policy is designed to ensure that work is carried out for or on behalf of Griffin College London that is free from improper influence and is independent, fair and devoid of bias.

All persons to whom this policy applies must avoid making decisions or handling matters where they have an interest that might influence, or be perceived to influence, their judgment. They must also avoid putting themselves in a position where there is or may be a conflict between the duties required as set out in their contract with Griffin College London and their own private interests.

Consequences of Breach of this Policy

Compliance with this policy is mandatory. Breaches may result in:

1. Disciplinary proceedings up to and including dismissal for employees.
2. Immediate termination of contract for a consultant, contractor or other service provider.

What is a Conflict of Interest?

In its General Conditions of Recognition (Condition A4), Ofqual states that a conflict of interest exists where:

1. The interests of an awarding organisation 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 in the development, delivery and award of its qualifications;
2. 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;
3. An informed and reasonable observer would conclude that either of these situations is the case.

Put simply, a conflict of interest is a private interest which might influence a person's judgment in carrying out his contractual duties for an awarding organisation and thereby undermine the actual or perceived independence and integrity of that awarding organisation.

Examples of Conflicts of Interest

- A personal relationship, whether or not declared. This might include a close professional relationship, friendship, a family tie (e.g. cousin, niece, nephew etc.), a romantic relationship etc.
- A contractual relationship, for example, where an examiner is also a candidate's tutor or in the employ of the centre where he/she is conducting examinations.
- A relationship where one individual is beholden to the other. For example, this might occur where gifts or hospitality have been exchanged or money has been borrowed or bribes accepted (on Griffin College London's policy on bribery see further below).

Procedures to be Followed to Identify Possible Conflicts

Griffin College London will carry out continuous monitoring of operations and employees to ensure that any conflicts of interest in relation either to the organisation's activities, or to the activities of employees and others working for the Griffin College London are identified and alleviated as soon as possible. This includes, for example, anything relating to training activities especially where examiners may be involved. To do this, the GCL will carry out the following activities:

- (a) In the course of normal operations, the Head of Customer Services and Quality Assurance will monitor that activities do not conflict with its other functions. Any conflicts identified will be flagged to the Chief Executive Officer.
- (b) In relation to identification of potential conflicts of interest in relation to those working for it, the GCL will identify potential conflicts of interest as follows:-

For all examiners, assessors and markers, including Chief Examiners:

- As part of the initial appointment process, CVs will be checked by the Head of Customer Services and Quality Assurance and Faculty Heads to identify any possible conflicts of interest. Where uncertainty remains, these will be explored as part of the interview process.
- Upon appointment, they sign an Examiner's agreement which specifies rules in relation to their GCL work. They are also required to sign a form declaring where they currently and recently have worked so that they are not allocated work from those schools, and that work they accept can be monitored to ensure there is no conflict of interest. These forms are issued and retained by the Head of Customer Services and Quality Assurance. They will be asked to notify the Head of Customer Services and Quality Assurance of changes of employment which may affect their ability to examine in the immediate future, and re-complete on an annual basis. They also confirm that they will not knowingly accept a booking for an examination session where they have knowledge of the candidates.
- Where a conflict of interest is declared or arises, and where this relates to examining candidates for any reason for a specific teacher, this will be dealt with by a bar in the relationship within the examinations systems. For any other type of conflict this will be reported to the relevant Faculty at its next meeting, for recognition and if necessary, resolution.
- Where an examiner/teacher who delivers, or expects to deliver the qualification is involved in the development of the qualification, that development work must be subject to scrutiny by an expert panel to ensure that it meets the needs of all learners and has no bias towards any specific group or type of learners.

Where GCL training courses are delivered by an examiner, records of attendees are maintained to enable audit of any potential candidates if necessary.

Procedures to be Followed in the Event of an Unforeseen Conflict of Interest Arising	<p>Manager/first point of contact at Griffin College London and, in any event, <i>before you conduct the activity affected by the conflict of interest</i>. For example, if you are an examiner out on tour and find yourself presented with a candidate that you are related to or is otherwise linked to you through a personal or professional connection, you should raise this conflict immediately with the Operations Team in London and/or the National Representative in the territory.</p> <ul style="list-style-type: none"> • Where you discover the existence of an actual or possible conflict of interest after the activity to which the conflict might apply has taken place, you will again need to inform your line manager/first point of contact at Griffin College London immediately. You will be asked to make a record of the activity and the fact that you were unaware at the time of any conflict of interest and provide details of when and how you became aware of the conflict.
Overlap with Other Griffin College London Policies	<p>Conflicts of interest fall within the scope of a number of Griffin College London's other policies and anybody who thinks they have a conflict of interest falling into any of the examples listed above should also refer to:</p> <p>Griffin College London's Code of Conduct which covers personal relationships between members of staff.</p> <p>Griffin College London's Bribery and Anti-Corruption policies which set out Griffin College London's stance on bribery and corruption for Griffin College London's employees and independent service providers.</p>
Retention and storage of personal data	<p>All personal data collected as part of this procedure will be stored securely at all times, in accordance with Griffin College London's Data Protection Policy and Privacy Statement.</p>
Review	<p>This policy is subject to the review of Griffin College London's Executive and/or as required by changes to legislation.</p>
Date of next review	<p>21/10/2025</p>

Conflict of Interest Declaration Form for Examiners

All individuals involved as an Examiner must sign this Form.

Statements

1. I acknowledge that my official duties cause me to have access to documents or data pertaining during my tenure as an Examiner, I am aware that unauthorised disclosure of information could damage the integrity of the Organisation and that transmission or revelation of such information to unauthorised persons will subject me to disciplinary action.
2. I will not divulge, publish, or reveal by word, conduct, or any other means such information or knowledge, except as necessary to do so in the performance of my official duties during my tenure as an Examiner and in accordance with the laws of the United Kingdom.
3. I acknowledge that the information I receive will be given only to persons specifically appointed me as an examiner, and it may not be further divulged without specific prior written approval from an Authorised Individual.
4. If at any time during my tenure as an Examiner, my participation might result in an actual, potential or perceived conflict of interest, I will immediately report the circumstances to the Head of department.

Declaration Guidance

Declaration A should be signed if there are no actual, potential or perceived conflicts of interest.

Declaration B should be signed if there are actual, potential or perceived conflicts of interest. The conflicts of interest and mitigation must be stated in Appendix 1 below, as must the role that the Examiner will be carrying out (where appropriate) within the tenure period.

Head of Department must also sign Declaration B to confirm that they accept that appropriate mitigations have been put in place.

Declaration A (if no conflicts of interest)

By signing this Form, I declare that I have read and accept the Policy, and that there are no conflicts of interest of any nature which would prevent me from undertaking the role as an Examiner.

If any actual, potential or perceived conflicts of interest arise in the future, I will inform the Head of Department.

Name:

Job Title:

Department:

Signature:

Date:

Declaration B (if actual, potential of perceived conflicts of interest)

By signing this Form, I confirm that the conflicts of interest in Appendix 1 have been mitigated appropriately.

If any other actual, potential or perceived conflicts of interest arise in the future, I will inform the Head of Department.

Name:

Job Title:

Organisation / Department:

Signature:

Date:

Appendix 1

My conflict(s) of interest, including mitigations, is/are:

Conflict of interest [insert text]

Mitigation [insert text]

Role:

Head of Department

By signing this Form, I confirm that the conflicts of interest in Appendix 1 have been mitigated appropriately, and therefore the individual's role also stated in Appendix 1, is appropriate.

Name:

Job Title:

Department:

Signature:

Date:

About GCL

Griffin College London is a leading Examination Board to develop the knowledge, skills and practices expected to help organisations flourish, we offer an expansive and creative scope of products and services that help people achieve their potential through Examinations.

We believe in a world where individuals and associations have the certainty and capabilities to thrive, today and in the future. So, we work with like-minded partners to foster the abilities that businesses demand across the world.

Contacts

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