

LONDON MATHS & SCIENCE COLLEGE

Conflict of Interest Policy

Identifying, declaring, recording and managing conflicts of interest in examinations and assessments

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Policy owner	Principal / Head of Centre
Approved by	Proprietor
Applies to	All staff, senior leaders, invigilators, assessors, contractors and volunteers involved in any aspect of examinations and assessments at London Maths & Science College, and to all candidates
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1. Purpose

- 1.1 This policy sets out how London Maths & Science College (“LMSC” or “the centre”) identifies, declares, records, mitigates and reports conflicts of interest affecting the delivery and administration of examinations and assessments.
- 1.2 Its purpose is to ensure that no person is placed in a position where their judgement in relation to an examination or assessment could reasonably be questioned, and that where such a position arises it is declared, managed and made known to the awarding organisation.
- 1.3 A conflict of interest is not in itself misconduct. Failing to declare one is.

2. Scope

- 2.1 This policy applies to every person involved in any aspect of examinations or assessments at LMSC, including the Proprietor, the Head of Centre, senior leaders, the Examinations Officer and deputy, teaching and support staff, invigilators, access arrangements assessors, technicians, contractors, agency staff and volunteers.
- 2.2 It applies to all qualifications LMSC delivers and to all assessment types, including written examinations, on-screen assessment, non-examination assessment, coursework, practical endorsement and practical examinations, wherever they take place.
- 2.3 It applies to internal candidates, private candidates, external candidates and transferred candidates alike.

3. Regulatory context

- 3.1 This policy is written to comply with the JCQ General Regulations for Approved Centres, 1 September 2025 to 31 August 2026, and in particular the requirement at section 5.3(j) that the centre informs the awarding bodies of conflicts of interest before the published deadline for entries for each examination series.
- 3.2 It is also written to comply with the JCQ Instructions for Conducting Examinations, the JCQ Instructions for Conducting Non-Examination Assessments, the JCQ Access Arrangements and Reasonable Adjustments publication, and the requirements of each awarding organisation with which LMSC holds centre approval.
- 3.3 From 1 September 2026 the corresponding 2026/27 publications apply. The Examinations Officer updates the citations at clauses 3.1 and 3.2 on the day of publication and records the date. **The record of that update is retained as evidence.**
- 3.4 Personal data collected under this policy is processed in accordance with the UK GDPR, the Data Protection Act 2018 and the centre’s Data Protection and Confidentiality Policy.

4. Definitions

- 4.1 A conflict of interest exists where a person’s personal, familial, financial or commercial interest could influence, or could reasonably be seen by another person to influence, the way in which that person carries out a duty in relation to examinations or assessments.
- 4.2 An actual conflict exists now. A potential conflict is one that will or may arise. A perceived conflict is one that a reasonable outside observer would think exists, whether or not it does. All three are declarable under this policy, and the test applied is the perception of a reasonable outside observer, not the honest belief of the person concerned.

- 4.3** Relative includes a spouse, civil partner or partner, parent, step-parent, child, step-child, sibling, step-sibling, grandparent, grandchild, aunt, uncle, niece, nephew, cousin, and the equivalent relations of a spouse, civil partner or partner. Close personal relationship includes any other relationship of a kind that a reasonable outside observer would regard as capable of affecting impartiality.
- 4.4** Another approved centre means any organisation approved by an awarding organisation to deliver or administer regulated qualifications, whether or not it uses the same awarding organisations as LMSC.

5. Circumstances that must be declared

- 5.1** The following must be declared. The list is not exhaustive, and clause 5.9 catches anything not listed.

5.2 Staff or their relatives sitting examinations at LMSC

- A member of staff who is entered, or intends to be entered, as a candidate at LMSC
- A relative of a member of staff who is entered, or intends to be entered, as a candidate at LMSC
- Any such case where the qualification concerned contains an internally assessed component, which requires particular care and must be notified to the awarding organisation in every instance

5.3 Staff assessing, teaching or moderating the work of relatives

- Teaching, tutoring or supervising a candidate to whom the member of staff is related or with whom they have a close personal relationship
- Marking, assessing, moderating or authenticating the work of such a candidate
- Assessing, authorising or applying an access arrangement for such a candidate
- Invigilating any session sat by such a candidate

5.4 Relationships with other approved centres

- Holding any role, office, directorship, shareholding, employment, consultancy or other interest at another approved centre
- Any relationship of ownership, control or common management between LMSC and another approved centre
- Any arrangement under which another approved centre supplies premises, facilities, staff or services to LMSC, or under which LMSC supplies any of those to another approved centre
- Any circumstance in which the same individual holds a position of responsibility for examinations at LMSC and at another approved centre

5.5 Relationships within the centre

- A relationship between the Head of Centre and any member of examinations staff
- A relationship between the Examinations Officer and any other member of examinations staff, or any invigilator
- Any reporting line in which one party is related to the other

5.6 Access arrangements

- An assessor assessing a candidate whom they teach, or with whom they have any relationship

- Authorisation of an access arrangement by a person who teaches the candidate in the subject concerned

5.7 Financial and commercial interests

- Any financial or commercial interest in an organisation supplying goods, services or premises to LMSC in connection with examinations or assessments
- Any benefit, payment, gift or hospitality received in connection with examinations or assessments

5.8 Private tuition

- Private tuition provided by a member of staff, or by a relative of a member of staff, to any LMSC candidate, whether paid or unpaid and whether provided at LMSC or elsewhere

5.9 Anything else

- Any other circumstance that a reasonable outside observer could regard as capable of affecting impartiality in relation to examinations or assessments at LMSC

6. Roles and responsibilities

- 6.1** Where a post below is vacant, the Head of Centre records in writing who is discharging it and from what date.

Role	Post-holder	Responsibility under this policy
Principal / Head of Centre	Eman Ahamed	Owns this policy. Assesses every declaration other than his own, decides the mitigation, maintains oversight of the register, and notifies the awarding organisations before each entry deadline.
Examinations Officer	Anis Zaman	Issues and collects declaration forms, maintains the central register, prepares the notification to each awarding organisation, and retains the evidence. Does not assess or decide the mitigation for his own declaration.
SENCo / Access Arrangements Lead (external)	Lahcen Lebetiou	Declares any relationship with a candidate for whom he assesses or authorises an access arrangement.
All staff, invigilators, assessors and contractors	—	Complete an annual declaration, and declare any new conflict as soon as it arises.

7. The annual declaration

- 7.1** Every person within the scope of this policy completes the declaration at Appendix A once in each academic year, in September, and in any event before they undertake any duty in relation to an examination series.
- 7.2** A person joining the centre, or taking on an examinations duty for the first time, completes a declaration before their first deployment.

- 7.3** A nil return is required. A person with nothing to declare completes and signs the form recording that fact. Absence of a form is treated as a failure to declare.
- 7.4** The Examinations Officer issues, collects and retains the forms, and reports to the Head of Centre on any person who has not returned one. No person may invigilate, assess or access confidential assessment material until their declaration has been returned.
- 7.5** The Head of Centre's own declaration is made to, and assessed by, the Proprietor.

8. Declaring a conflict during the year

- 8.1** A conflict that arises after the annual declaration has been made is declared as soon as the person becomes aware of it, and in any event before it can affect any examination or assessment decision.
- 8.2** A person who is unsure whether something is declarable declares it. The assessment of whether it amounts to a conflict is not theirs to make.
- 8.3** Where a person becomes aware of an undeclared conflict affecting someone else, they report it under clause 9 of the Malpractice and Maladministration Policy.

9. The central register

- 9.1** The centre maintains a single central Conflicts of Interest Register in the form at Appendix B. It is maintained by the Examinations Officer and held with the examinations records.
- 9.2** Every declared conflict is entered on the register, whether or not it is considered material, together with the mitigation applied and the date on which the awarding organisation was notified.
- 9.3** Register entries are not deleted. Where a conflict ends, the entry is closed with the date and the reason, and remains on the register.
- 9.4** The register is reviewed by the Head of Centre before the entry deadline for each examination series, and by the Proprietor annually. Each review is dated and signed.
- 9.5** The register, the completed declaration forms and the notifications sent to awarding organisations are retained together and produced to an inspector on request.

10. Assessing the conflict and applying mitigation

- 10.1** The Head of Centre assesses each declaration, other than his own, and decides what mitigation is required. The Proprietor assesses the Head of Centre's declaration.
- 10.2** The mitigations below are normally applied. They are a minimum, not a ceiling, and the person assessing the conflict applies more where the circumstances require it.

Conflict	Mitigation normally applied
A member of staff, or a relative of a member of staff, is entered as a candidate at LMSC	The member of staff has no access to confidential assessment material for that series, is excluded from invigilation of any session that candidate sits, and takes no part in any internally assessed component for that candidate. Where the member of staff is a key holder, the key is surrendered for the duration of the series. Notified to the awarding organisation.

Conflict	Mitigation normally applied
A member of staff teaches, assesses, marks or moderates the work of a relative	The work is assessed and internally moderated by a different assessor. Where no second assessor exists at the centre, an external assessor is engaged, or the awarding organisation's agreement to an alternative arrangement is obtained before the assessment takes place. Notified to the awarding organisation.
A member of staff holds a role at, or an interest in, another approved centre	The relationship is declared in full to every awarding organisation with which LMSC holds approval, with the roles held at each centre and the ownership relationship between them. Duties are separated so that no person can approve, assess or oversee the same transaction at both centres. Where the other centre supplies premises or services to LMSC, the agreement is in writing and the person with the interest takes no part in awarding, varying or paying under it.
An access arrangements assessor assesses a candidate they teach or have a relationship with	The assessment is carried out by a different suitably qualified assessor. Authorisation of the arrangement is given by a person with no teaching relationship with the candidate.
An invigilator is related to, or has a close personal relationship with, a candidate	The invigilator is not deployed to any session that candidate sits, and this is recorded on the invigilation deployment record.
A member of staff provides private tuition to an LMSC candidate	Declared. The member of staff takes no part in the internal assessment, moderation or access arrangement decisions for that candidate, and has no access to confidential assessment material relevant to that candidate's subjects.
A conflict affecting the Examinations Officer	Assessed and decided by the Head of Centre, with independent oversight by the Senior Leader responsible for examinations. The Examinations Officer takes no part in the assessment of his own declaration.
A conflict affecting the Head of Centre	Declared to and assessed by the Proprietor, who decides the mitigation and makes the notification to the awarding organisation. The Head of Centre takes no part in that decision.

10.3 Mitigation is recorded on the register and communicated in writing to the person concerned and to anyone who must act on it, including the Examinations Officer for rooming and invigilation purposes.

10.4 Where no mitigation can adequately manage a conflict, the centre does not proceed with the arrangement, and where the matter concerns a candidate entry, the awarding organisation is asked to advise before the entry is made.

11. Notifying the awarding organisations

11.1 LMSC informs the awarding bodies of conflicts of interest **before the published deadline for entries for each examination series**, as required by JCQ General Regulations section 5.3(j). This is a mandatory requirement and is not a matter of judgement.

11.2 The Examinations Officer prepares the notification from the register and the Head of Centre signs it. Where the conflict concerns the Head of Centre, the Proprietor signs it.

11.3 The notification states the person, their role at the centre, the nature of the conflict, the candidates and components affected, and the mitigation applied.

- 11.4** The notification is sent by a route that produces a record, and the notification and any acknowledgement are filed with the register.
- 11.5** For the November 2026 series with AQA, the entry deadline is 4 October 2026 and the notification must be made before that date. Deadlines for subsequent series are taken from the awarding organisation's published key dates.
- 11.6** Where a conflict arises after the entry deadline has passed, the awarding organisation is informed without delay rather than held over to the next series.

12. Conflicts involving the Head of Centre or the Examinations Officer

- 12.1** A declaration by the Examinations Officer is assessed and decided by the Head of Centre, with independent oversight by the Senior Leader responsible for examinations.
- 12.2** A declaration by the Head of Centre is made to the Proprietor, assessed and decided by the Proprietor, entered on the register by the Proprietor or at their direction, and notified to the awarding organisation by the Proprietor. The Head of Centre takes no part in that process.
- 12.3** Where an allegation is made that a conflict has not been declared, the escalation routes at clause 7 of the Malpractice and Maladministration Policy (LMSC/MMP/02) apply.

13. Failure to declare

- 13.1** Failing to declare a conflict of interest, or giving inaccurate information on a declaration, may constitute malpractice or maladministration and is dealt with under the Malpractice and Maladministration Policy.
- 13.2** Where a failure to declare comes to light, the Head of Centre — or the Proprietor where clause 12.2 applies — considers whether any assessment decision has been affected and, if so, reports the matter to the awarding organisation immediately.
- 13.3** No detriment follows for a person who declares a conflict, however awkward the declaration. Detriment follows for a person who conceals one.

14. Confidentiality, data protection and retention

- 14.1** Declarations contain personal data and, in some cases, information about family relationships. They are held securely with access restricted to the Head of Centre, the Proprietor, the Examinations Officer and any person with a legitimate role in assessing a particular declaration.
- 14.2** Declarations and register entries are retained for the period set out in the centre's Record Retention Policy, and in any event for no less than the period required by the relevant awarding organisation.
- 14.3** Where a declaration names a person who is not a member of staff, only the information necessary to assess and manage the conflict is recorded.

15. Monitoring and review

- 15.1** This policy is reviewed by the Head of Centre and approved by the Proprietor annually, in September, immediately following publication of the JCQ documents for the new academic year.
- 15.2** It is also reviewed following any case in which a conflict was not declared or was not adequately managed, and following any change to the post-holders named at clause 6.

- 15.3** The Head of Centre reports annually to the Proprietor on the operation of this policy, including the number of declarations received, the conflicts identified, the mitigations applied and the notifications made.

16. Associated documents

- Malpractice and Maladministration Policy (LMSC/MMP/02)
- Examination Policy
- Exam Security Policy
- Exam Room Conduct and Invigilation Policy
- Access Arrangements and Reasonable Adjustments Policy
- Non-Examination Assessment, Coursework and Controlled Assessment Management Policy
- Whistleblowing Policy
- Staff Code of Conduct and Safer Working Practice
- Data Protection and Confidentiality Policy
- Record Retention Policy
- Examinations Roles and Responsibilities Schedule

17. Approval and review record

Version	Date	Owner	Approved by	Summary of change
1.0	1st August, 2026	Head of Centre	Proprietor	First issue.

APPENDIX A

Annual Conflict of Interest Declaration

To be completed by every person involved in examinations or assessments at LMSC, in September each year and before any examinations duty. A nil return is required.

Full name	
Role(s) held at LMSC	
Academic year	

	Declaration	Delete as applicable
1	Are you, or is any relative or person with whom you have a close personal relationship, entered or intending to be entered as a candidate at LMSC in this academic year?	Yes / No
2	Do you teach, assess, mark, moderate or supervise the work of any candidate to whom you are related or with whom you have a close personal relationship?	Yes / No
3	Do you hold any role, directorship, shareholding, employment or other interest at any other approved examination centre?	Yes / No
4	Do you provide, or does a relative provide, private tuition to any LMSC candidate?	Yes / No
5	Do you have any financial or commercial interest in any organisation that supplies goods, services or premises to LMSC in connection with examinations or assessments?	Yes / No
6	Are you related to, or do you have a close personal relationship with, any other member of LMSC staff involved in examinations?	Yes / No
7	Is there any other circumstance that could reasonably be seen by another person as affecting your impartiality in relation to examinations or assessments at LMSC?	Yes / No

Where you have answered Yes to any question, give full details below

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I confirm that the information given above is complete and accurate. I understand that I must declare any new conflict as soon as it arises, and that failing to declare a conflict of interest may be treated as malpractice.

Signature: _____

Date: _____

For completion by the Head of Centre (or the Proprietor where the declaration is the Head of Centre's)

Conflict identified: Yes / No

Mitigation applied: _____

Entered on register: Yes / No Ref: _____

Awarding organisation notified: Yes / No / N/A

Signature: _____

Date: _____

APPENDIX B

Conflicts of Interest Register

Maintained by the Examinations Officer. Reviewed and signed by the Head of Centre before the entry deadline for each series, and by the Proprietor annually. Entries are closed, never deleted. The first row below is an illustration and should be replaced.

Ref	Date declared	Person and role	Nature of the conflict	Mitigation applied	AO notified — date and series	Reviewed by
01	[example]	A N Other, Subject Teacher	Teaches a candidate to whom he is related, in a subject with an internally assessed component	NEA marked and internally moderated by a second assessor; no access to that candidate's assessment record	AQA, before the entry deadline for the series	Head of Centre

Reviewed by Head of Centre — signature: _____ Date: _____ Series: _____

Reviewed by Proprietor — signature: _____ Date: _____ Academic year: _____

