

Conflict of Interest Policy

1. Introduction:

This document establishes the policy governing the identification, oversight, and resolution of Conflicts of Interest arising from Elizabeth Samuels' Drama School examinations.

Elizabeth Samuels Drama School is an independent drama school for primary and secondary school students, based in West London.

The objective of this policy is to uphold the integrity of Elizabeth Samuels' Drama School Examinations, its certifications, accredited centres, examiners, students, and the parents/guardians of students.

This policy applies to all individuals associated with Elizabeth Samuels Drama School, including examiners, staff members, students, and parents/guardians.

2. Definitions

2.1 “Conflict of Interest”: A conflict of interest emerges when an individual (examiners, staff members, students, and parents/guardians) or organisation possesses conflicting interests or allegiances. According to Ofqual, a conflict of interest occurs in relation to an awarding organisation when:

- Its interests in any activity it engages in, on its own behalf, or by a member of its Group, have the potential to prompt actions contrary to its interests in the development, delivery, and conferment of its qualifications while adhering to its Conditions of Recognition.
- An individual linked to the development, delivery, or conferment of qualifications by the awarding organisation holds interests in any other activity which could potentially lead them to act in opposition to their interests in that development, delivery, or conferment, in compliance with the awarding organisation's Conditions of Recognition.
- An informed and reasonable observer would deduce that either of these situations is the case.

This implies that Elizabeth Samuels Drama School has an obligation to mitigate, to the greatest extent possible, any risks associated with circumstances where conflicts of interest arise or could potentially arise. Moreover, all individuals

connected with Elizabeth Samuels Drama School bear a responsibility to promptly disclose any activity that may constitute a potential or actual conflict of interest, or any activity that may be perceived as such.

2.2 “Accredited Centre”: A private venue where a examiners examines students

2.3 "Group" (as mentioned in the Ofqual definition): In the context of Elizabeth Samuels Drama School, the term "Group" refers to the collective entities involved in the assessment, examination, and administrative processes. This encompasses students, faculty members, staff, examiners, and any other stakeholders directly engaged in the examination and assessment procedures conducted by Elizabeth Samuels Drama School. It also includes any relevant administrative personnel responsible for the coordination and oversight of these processes within the institution. This clarification is essential to ensure that all individuals associated with the school are aware of their roles and responsibilities in upholding the integrity and fairness of examinations and assessments.

2.4 "Impartial Party" (used in the Appeals section): In the context of the appeals process, an "Impartial Party" refers to an individual (Sam Davis) designated to review appeals in a fair, unbiased, and objective manner. This party is independent from the initial assessment or decision-making process and holds no personal or professional stake in the outcome of the appeal. Their role is to thoroughly examine the grounds for appeal, assess the evidence provided, and make a determination based solely on the merits of the case. This designation of an impartial party ensures that the appeals process is conducted with transparency, integrity, and without any potential conflicts of interest, thereby instilling trust and confidence in the fairness of the review process.

2.5 "Confidentiality" (as mentioned in the Confidentiality section): Confidentiality, denotes the strict safeguarding of sensitive information related to reported instances of malpractice or maladministration. It ensures that all parties involved, including the individuals reporting the incident, those being investigated, and any relevant personnel, treat the matter with the utmost discretion and refrain from discussing or disclosing details to unauthorised individuals. Maintaining confidentiality is of paramount importance in the conflict resolution process for several key reasons:

- **Protecting Privacy:** It respects the privacy rights of all individuals involved, preserving their dignity and avoiding undue exposure.

- Promoting Trust: It fosters an environment of trust and confidence in the institution's commitment to fair and impartial handling of conflicts.
- Preventing Retaliation: It helps shield individuals who report incidents from potential retaliation, ensuring they feel secure in coming forward with their concerns.
- Preserving Integrity: It upholds the integrity of the investigative process, allowing for an unbiased assessment of the situation.
- Compliance with Legal and Ethical Standards: It aligns with legal and ethical obligations to protect sensitive information and maintain the confidentiality of individuals involved.

Throughout the conflict resolution process, all parties, including the Examination Board, impartial reviewers, and any relevant personnel, are bound by a strict code of confidentiality. They are prohibited from discussing or disclosing details of the case to anyone not directly involved in the investigation. Any breach of this confidentiality could result in disciplinary action.

2.6 "Public Disclosure" (as mentioned in the Transparency Measures section): "Public Disclosure," pertains to the act of sharing information related to instances of malpractice, maladministration, or other relevant concerns with the wider community or authorities beyond the immediate parties involved. At Elizabeth Samuels Drama School, individuals are encouraged to make public disclosures through the designated channel of communication, which is via email. They may do so by sending an email to sam@elizabethsamuelsdrama.com. This email address is provided for the specific purpose of receiving such disclosures, ensuring that the information is directed to the appropriate authorities for review and action.

This approach to public disclosure is designed to facilitate open communication and transparency within the school community, allowing individuals to report concerns in a secure and confidential manner. It also demonstrates the institution's commitment to addressing issues promptly and fairly, upholding the highest standards of integrity and accountability.

2.7 "Complainant" (used in the Appeals section): In the context of this policy, a "complainant" refers to the individual or party who lodges a formal complaint or appeal regarding an assessment, examination, or related process conducted by Elizabeth Samuels Drama School. The complainant is typically the person directly affected by the outcome or decision being challenged. This may include a student or any other stakeholder who believes that an error, injustice, or irregularity has occurred in the assessment process and seeks a review or resolution. The complainant's role is crucial in initiating the appeals process, as they provide the grounds, evidence, and documentation necessary for a thorough and impartial evaluation of the situation.

2.8 "Conflict of Interest Report" or "COI Report": A "Conflict of Interest Report" (COI Report) is a formal document or process through which individuals within Elizabeth Samuels Drama School are expected to disclose any situations or circumstances that may give rise to a conflict of interest. This report outlines specific details about the potential conflict, including the parties involved, the nature of the conflict, and any relevant contextual information.

Individuals are encouraged to submit a Conflict of Interest Report whenever they become aware of a situation that could compromise their objectivity, impartiality, or fairness in any aspect of their responsibilities within the school. This may include situations where personal, financial, or professional interests intersect with their duties, potentially influencing their decision-making or actions.

The submission of a Conflict of Interest Report is a crucial step in upholding the highest standards of integrity and ensuring transparency in the operations of Elizabeth Samuels Drama School. It allows the institution to identify and address potential conflicts promptly, thereby safeguarding the fairness and credibility of its processes and decisions.

2.9 "Quality and Compliance Team": The "Quality and Compliance Team" at Elizabeth Samuels Drama School serves as a dedicated unit responsible for overseeing and ensuring adherence to established quality standards and compliance measures within the institution. They assist in conflict resolution, monitor compliance, and drive continuous improvement efforts. This team plays a vital role in upholding the school's integrity and accountability.

3. Examples of Conflicts of Interest (not an exhaustive list):

Examiner:

- Possesses knowledge of, or may be acquainted with, certain students at a centre, even if this is historical.
- Provides instruction, or has previously provided instruction, at a centre to which they have been assigned.
- Has a personal relationship with a teacher at a centre to which they have been assigned.
- Initiates direct communication with a Elizabeth Samuels Drama School centre, teacher, customer, or student unless explicitly related to an assigned examination session.
- Engages in employment at another awarding organisation or a direct competitor without prior written consent from the Principal of Elizabeth Samuels Drama School.
- Conducts a workshop or promotional event in the capacity of Elizabeth Samuels Drama School location without prior written approval from Elizabeth Samuels Drama School.

A member of Elizabeth Samuels Drama School Staff:

- Has previously been employed at an accredited centre or direct competitor.
- Has a family member who is employed or has been employed at an accredited centre or direct competitor.

5. Conflict of Interest Management Process:

Elizabeth Samuels Drama School will uphold an exhaustive record of all identified Conflicts of Interest and guarantee that these records are subject to review and update at least once a year. Additional reviews will be conducted on an ad-hoc basis should new Conflicts emerge in the interim.

All individuals involved with Elizabeth Samuels Drama School have a duty to report any situations that may be deemed a Conflict of Interest as soon as they come to light.

5.1 Informal Resolution

We encourage individuals to attempt an informal resolution of their concerns before initiating a formal complaint. This can often resolve issues more quickly and amicably.

To do this contact Elizabeth Samuels Drama School Principal:

Name: Samuel Davis

Email: sam@elizabethsamuelsdrama.com

Phone number: 07429478447

5.2 Formal Complaint Procedure

If your concern is not resolved informally or if you are dissatisfied with the resolution, you may proceed with a formal complaint by following these steps:

5.2 a. Submitting a Written Complaint

Compose a written complaint detailing the nature of the concern, any previous attempts at resolution, and the desired outcome. Address the complaint to the principal, and submit it by email sam@elizabethsamuelsdrama.com. Please see our complaints procedure [here](#).

5.2 b. Acknowledgment

Upon receiving your formal complaint, we will send you an acknowledgment within five working days. This acknowledgment will include details of the person responsible for handling your complaint and an estimated timeframe for resolution.

5.2 c. Investigation and Resolution

The designated person will thoroughly investigate your complaint, which may involve speaking with relevant parties and gathering relevant information. We aim to resolve complaints within 15 working days from the date of acknowledgement. If more time is needed, we will communicate this to you, along with reasons for the delay.

5.2 d. Response

Once the investigation is complete, we will provide you with a written response outlining the outcome of the Conflict of Interest and any actions taken. We are committed to addressing all complaints fairly and impartially.

5.3 Appeals

If you remain dissatisfied with the outcome of your complaint, you have the right to appeal within 10 working days of receiving the response. Your appeal should outline the reasons for your dissatisfaction and any additional information you wish to provide. The appeal will be reviewed by an impartial party not involved in the initial investigation.

5.4 Final Resolution

Following the appeal, we will issue a final resolution in writing within 15 working days. This decision will be binding.

5.5 Confidentiality

All complaints and related information will be treated with the utmost confidentiality. We will only share information with those directly involved in the resolution process. We are

committed to continuous improvement and value your feedback. Your concerns and complaints help us enhance the quality of our drama school. Please be assured that lodging a complaint will not result in any adverse treatment or discrimination against the complainant.

All reports will be referred to the Principle.

6. Roles and Responsibilities:

- Principal of Elizabeth Samuels Drama School: The Principal (Sam Davis) is responsible for handling conflicts of interest related to the drama school, including addressing complaints and overseeing the resolution process.
- All individuals associated with Elizabeth Samuels Drama School: Everyone connected to Elizabeth Samuels Drama School, including examiners, staff members, students, and parents/guardians, has a responsibility to promptly report any potential or actual conflicts of interest.

7. Transparency:

7.1 All individuals linked with Elizabeth Samuels Drama School must be forthright regarding the nature of any potential or actual conflicts of interest and must refrain from concealing or distorting them.

7.2 Requires individuals with a Conflict of Interest to make public disclosures of their interests when relevant, so Elizabeth Samuels Drama School is aware of the potential bias.

8. Training and Education:

Elizabeth Samuels Drama School is committed to promoting awareness and preventing conflicts of interest among all individuals associated with our organisation. We recognise that education and training are essential components of our conflict of interest management strategy. The following outlines our commitment to providing guidance and resources to ensure everyone understands and can effectively navigate situations involving conflicts of interest:

8.1. Training Initiatives:

We will provide training sessions and educational materials designed to inform and educate all relevant parties about conflicts of interest. These initiatives will cover the following topics:

- Definition of Conflicts of Interest: Clear explanations of what constitutes a conflict of interest, including examples relevant to our organisation.
- Identification: Guidance on recognising potential conflicts of interest and understanding when disclosure is necessary.
- Disclosure Procedures: Detailed instructions on how and where to report conflicts of interest, including contact information for the responsible parties.
- Policy Overview: A comprehensive review of our Conflict of Interest Policy, including its purpose, definitions, and procedures.
- Ethical Guidelines: Emphasising the importance of ethical conduct and decision-making when conflicts of interest arise.
- Mitigation Measures: An overview of the potential actions that may be taken to mitigate conflicts of interest and ensure impartiality.

8.2. Access to Resources:

We will maintain accessible resources, including this Conflict of Interest Policy, related documents, and contact information for key personnel involved in conflict resolution. These resources will be readily available to individuals associated with Elizabeth Samuels Drama School.

8.3. Ongoing Education:

We understand that conflicts of interest can evolve over time. Therefore, our commitment to education is ongoing. We will periodically review and update our training materials to address emerging issues and maintain relevance.

8.4. Compliance Requirement:

Participation in conflict of interest training and education is a requirement for all individuals associated with Elizabeth Samuels Drama School. This includes examiners, staff members, students, and parents/guardians. By participating in these initiatives, individuals demonstrate their commitment to upholding the integrity and ethical standards of our organisation.

9. Uncertain Situations:

If there is any uncertainty regarding whether a situation could be perceived as a conflict of interest, please contact sam@elizabethsamuelsdrama.com.

10. Mitigation Measures:

Upon identifying a potential or actual conflict of interest, the Quality and Compliance Team will conduct an inquiry and implement practical measures to mitigate associated risks. These measures will be determined on a case by case basis.

Examples of actions may encompass (though are not limited to):

10.1 Monitoring and Supervision: Increase the level of oversight and supervision of the individual with the conflict to ensure their actions remain impartial and aligned with the organisation's interests.

10.2 Recusal from Specific Cases: If an examiner, staff member, or any relevant individual has a conflict of interest related to a specific case or decision, they should be recused from that particular case or decision-making process.

10.3 Peer Review: Implement a peer review process where the work or decisions of individuals with conflicts are subject to review by colleagues who are not conflicted. This can provide an additional layer of scrutiny.

10.4 Disclosure Statements: Require individuals with conflicts to provide detailed disclosure statements outlining the nature of their conflict, including any financial interests, relationships, or affiliations that could potentially influence their actions.

10.5 Third-Party Mediation: In particularly complex conflicts, consider involving an independent third party or mediator to help assess the situation and facilitate resolution.

10.6 Rotation of Roles: Rotate roles or assignments to minimise the potential for conflicts to arise in the first place. For example, if a staff member consistently works with a particular external organisation, consider rotating them to different tasks or teams periodically.

10.7 Training and Awareness Programs: Provide additional training and awareness programs specifically targeted at individuals with conflicts of interest to ensure they are well-informed about the risks and ethical considerations.

10.8 Stakeholder Involvement: Involve relevant stakeholders, such as students, parents, or guardians, in the decision-making process when conflicts of interest

could affect their interests. Their input can help ensure transparency and fairness.

10.9 Public Disclosure: In cases where public trust is crucial, consider publicly disclosing the nature of the conflict and the steps taken to mitigate it. This can demonstrate a commitment to transparency.

10.10 Code of Conduct: Develop or reinforce a code of conduct that clearly outlines expected behaviours and ethical standards for individuals with conflicts of interest.

10.11 Delay Actions: In some cases, it may be prudent to delay or postpone actions or decisions that are influenced by the conflict until a resolution or mitigation plan is in place.

It is the Principal of Elizabeth Samuels Drama School responsible for managing conflicts of interest.

Contact Information:

Elizabeth Samuels Drama School

Name: Samuel Davis

Email: sam@elizabetsamuelsdrama.com

Phone number: 07429478447

This policy will be updated annually by Elizabeth Samuels Drama School. Updates will be communicated to all parties involved.

Next review date: September 2024