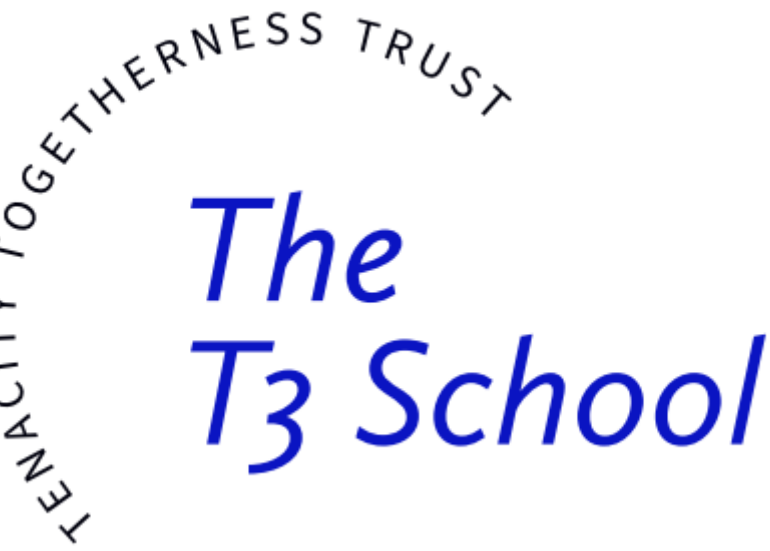


The T3 School
Conflict of Interest Policy
Reviewed September 2026
To be Reviewed September 2027

1. Introduction

The T3 School is committed to identifying, declaring and managing actual, potential and perceived conflicts of interest so that decisions are made fairly, transparently and in the best interests of pupils and the School. Effective management of conflicts supports sound leadership and governance and helps the proprietor ensure that the Independent School Standards are met consistently.

This policy also contains the School's arrangements for conflicts connected with examinations and assessments and should be read alongside the current Joint Council for Qualifications (JCQ) regulations and the requirements of relevant awarding organisations.

2. Purpose and regulatory framework

The purpose of this policy is to protect the integrity of School decision-making, safeguarding, recruitment, procurement, financial management, examinations and assessments, and to protect individuals by providing a clear process for disclosure and management of conflicts.

This policy supports the Education (Independent School Standards) Regulations 2014, in particular Schedule 1 Part 8 paragraph 34, under which the proprietor must ensure that persons with leadership and management responsibilities demonstrate appropriate skills and knowledge, fulfil their responsibilities effectively so that the Standards are met consistently, and actively promote pupils' wellbeing. It also has regard, where relevant, to the Equality Act 2010, UK GDPR and Data Protection Act 2018, Keeping Children Safe in Education 2026, the School's safeguarding and safer recruitment arrangements, and current JCQ and awarding-body requirements.

Where JCQ or an awarding organisation imposes a more specific requirement in relation to an examination or assessment, that requirement will take precedence for that examination or assessment.

3. Scope of Policy

This policy applies to the proprietor and anyone exercising governance functions, the Head of Centre, senior leaders, all employees (including full-time, part-time and casual staff), examination and assessment personnel, relevant volunteers, contractors, consultants and any other person involved in decision-making on behalf of the School.

It applies to decisions and activities including safeguarding, complaints, recruitment, staff management, procurement, contracts, finance, use of School resources, gifts and hospitality, outside employment or business interests, admissions where relevant, examinations and assessments, and access to confidential information.

4. Definition of conflict of interest

A conflict of interest exists where a person's personal, family, financial, professional or other interests or loyalties could improperly influence, or could reasonably appear to influence, the way they carry out their duties or make a decision for the School.

An actual conflict exists where competing interests are present now. A potential conflict exists where circumstances could develop into a conflict. A perceived conflict exists where a

reasonable person could consider that an individual's impartiality may be compromised, even if no improper influence has occurred.

Examples include a close personal relationship with a pupil, parent, candidate, job applicant, employee, supplier or contractor; a financial interest in a business dealing with the School; outside employment or consultancy; gifts or hospitality; involvement in a complaint, safeguarding matter or recruitment decision concerning a close associate; or access to examination information that could advantage a related person.

5. General principles

The School will act openly, fairly and proportionately. Individuals must disclose a conflict as soon as they become aware of it and must not wait until a decision is due. If in doubt, the interest should be declared.

No individual with a material conflict will determine for themselves that the conflict requires no action. The School will decide how it is to be managed and will keep an appropriate record. A person must not use their position, confidential information, School property or influence for personal benefit or to provide an improper advantage to another person.

No pupil, parent, member of staff or other person will be disadvantaged for raising a genuine concern about a possible undeclared conflict in good faith.

6. Declaring interests and the Register of Interests

Relevant individuals will be asked to make an annual declaration of interests and must update their declaration promptly whenever circumstances change. A declaration must provide sufficient information for the School to understand the nature and extent of the interest.

The School will maintain a confidential Register of Interests recording, as appropriate, the person making the declaration, the nature and date of the interest, the decision on how it will be managed, action taken, review dates and closure. Access will be limited to authorised persons and records will be retained in accordance with the School's data protection and records-retention arrangements.

Declarations should normally be made to the Head of Centre or the person designated by the Head of Centre. A conflict involving the Head of Centre must be referred to the proprietor or a suitably independent person nominated by the proprietor. A conflict involving the proprietor must be managed through an appropriately independent arrangement so that the conflicted person does not determine the matter.

7. Managing conflicts

Depending on the nature and seriousness of the conflict, management measures may include recording the declaration with no further action; additional oversight; restricting access to information; removing the person from discussion, assessment, shortlisting, interviewing, voting or decision-making; changing duties; appointing an independent decision-maker; or removing the individual from the relevant activity where the conflict cannot be managed adequately.

Where a person withdraws from a decision, the record or minutes should show the declaration, the fact of withdrawal or non-participation, and how the conflict was managed. Management arrangements will be reviewed if circumstances change.

8. Recruitment, procurement and financial decisions

Anyone involved in recruitment or appointment must declare any personal, family, financial, business or other significant relationship with an applicant. The School will decide whether the person should withdraw from shortlisting, interviewing, reference consideration or the appointment decision. Safer recruitment requirements must not be weakened because of a relationship or prior knowledge of a candidate.

Anyone involved in selecting or managing suppliers, contractors, consultants or other services must declare any relevant relationship or financial interest. They must not improperly influence the process and may be excluded from obtaining quotations, evaluating bids, approving expenditure or managing the contract where necessary.

Gifts, hospitality, discounts or other benefits that could influence, or reasonably appear to influence, a School decision must be declared and managed under the School's applicable arrangements. Individuals must not solicit or accept an improper benefit.

9. Safeguarding, complaints and sensitive decisions

A person must not lead, investigate or determine a safeguarding allegation, low-level concern, complaint, disciplinary matter or other sensitive decision where an actual or perceived conflict could reasonably call their impartiality into question. The matter will be referred to an appropriate unconflicted decision-maker.

Safeguarding concerns and allegations must always be dealt with under the Child Protection and Safeguarding Policy and Keeping Children Safe in Education 2026. Where required, the School will consult or refer to the Local Authority Designated Officer (LADO) or other statutory agency. Conflict management must never delay action needed to protect a child.

10. Examinations and assessments

The Head of Centre is accountable for ensuring that the School complies with the current JCQ General Regulations for Approved Centres and relevant awarding-body requirements. The School will maintain up-to-date records of examination and assessment conflicts and the measures taken to mitigate risk to the integrity of qualifications.

Before the applicable published deadline for entries for each examination series, the School will inform the relevant awarding body of conflicts that JCQ requires to be reported, including relevant cases where centre staff take qualifications at their own centre or teach, prepare or assess a family member, close friend or other person with whom they have a close personal relationship. This includes relevant Speaking, Listening or Oracy components where required by current JCQ regulations.

The School will also maintain the internal records required by JCQ, including relevant cases involving exams office staff whose family members or close friends are entered for examinations or assessments, and staff taking qualifications at the School or another centre. Records will include the mitigation applied and will be retained for at least the period required by current JCQ regulations.

The School will make every effort to avoid a candidate being assessed by a person with whom they have a close personal relationship. Where this cannot be avoided, the possible conflict will be declared to the relevant awarding body and the School will follow current JCQ and awarding-body requirements, including moderation requirements where applicable.

Anyone with access to confidential assessment materials must protect their security and confidentiality. No person may use privileged information or their position to give an unfair advantage to a candidate, disclose live assessment material without authority, or otherwise

compromise the integrity of an examination or assessment. Suspected malpractice or maladministration will be handled under the School's malpractice arrangements and reported to the relevant awarding body where required.

11. Outside interests, gifts and confidentiality

Outside employment, business activity, consultancy, trusteeships, directorships or other external roles must be declared where they may conflict with School duties or create a reasonable perception of divided loyalty. School time, information, systems and property must not be used for unauthorised private benefit.

Conflict declarations may contain personal or sensitive information. They will be handled confidentially, securely and in accordance with UK GDPR, the Data Protection Act 2018 and the School's data protection arrangements. Information may be shared where necessary to manage the conflict, comply with law, safeguarding duties, inspection or regulatory requirements, or JCQ/awarding-body obligations.

12. Breaches, concerns and whistleblowing

Failure to declare a relevant interest, withholding material information, participating improperly in a conflicted decision, misuse of confidential information or failure to comply with an agreed management plan may result in action under the School's disciplinary, contractual, safeguarding, examination-malpractice or other applicable procedures.

Anyone who believes that a conflict has not been declared or has been improperly managed should raise the matter with the Head of Centre or another appropriate senior person. Where appropriate, concerns may be raised under the School's Whistleblowing Policy. Concerns involving the Head of Centre or proprietor must be directed through an unconflicted route.

13. Roles and responsibilities

The proprietor is responsible for ensuring that appropriate arrangements exist to identify and manage conflicts of interest and for obtaining sufficient assurance that the policy is implemented effectively. The proprietor must ensure that its own conflicts are managed independently and do not compromise fulfilment of the Independent School Standards.

The Head of Centre is responsible for day-to-day implementation, ensuring staff understand the policy, maintaining or delegating maintenance of the Register of Interests, deciding proportionate management arrangements, and ensuring that examination conflicts are managed in accordance with current JCQ and awarding-body requirements.

All individuals within scope are responsible for reading this policy, making complete and timely declarations, complying with management arrangements, protecting confidential information and raising concerns where they believe a conflict may affect School decision-making.

14. Equality, monitoring and review

The School will implement this policy fairly and consistently and will have regard to the Equality Act 2010 and its Equality and Diversity arrangements. Reasonable adjustments will be made where required. The policy will not be used to discriminate unlawfully or to discourage legitimate declarations or concerns.

The proprietor and Head of Centre will review the effectiveness of these arrangements at least annually and sooner where legislation, Independent School Standards guidance, JCQ or awarding-body requirements, inspection findings, incidents or identified risks require change. This policy was reviewed in September 2026 and is due for review in September 2027.

Appendix 1: Conflict of Interest Declaration Form

Name: _____

Role / relationship to the School: _____

Date of declaration: _____

Please describe the actual, potential or perceived conflict, including the people, organisation, financial interest, relationship or activity involved:

_____

___

_____

___

Is the conflict connected with an examination or assessment? Yes / No

If yes, identify the qualification, examination series, candidate(s) and awarding organisation where known:

_____

___

Declarer's signature: _____ Date: _____

For School use - decision and management arrangements:

_____

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_____

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Decision-maker: _____ Review date: _____

Date entered on Register of Interests: _____