

Conflicts of Interest Policy

Academic Year 2025–2026

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| Version | 1.0 |
| Date approved | 23/09/2025 |
| Approved by | Senior Management |
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Purpose

London School of Management and Media (LSMM) staff, including contractors, must understand their obligations in relation to confidentiality and the procedures for identifying, monitoring and managing actual, perceived and potential conflicts of interest.

A conflict of interest is where an informed and reasonable observer would conclude that an individual has competing interests, which might impair their ability to make objective and unbiased decisions or to act contrary to the interests of LSMM or contrary to the requirements of the awarding organisation and/or its regulators.

A personal interest is a conflict of interest that relates to an individual. This is where any informed and reasonable observer would conclude that a person has interests in any activity that could have the potential to lead that person to act contrary to his or her own interests. A personal interest can be financial or non-financial in nature, examples could include:

- an examiner marking work for a learner with whom they have a personal relationship
- an individual invigilating an exam for a learner with whom they have a personal relationship
- a tutor invigilating their own learners
- a member of staff with direct or indirect financial interest in the outcome of any assessment.

Scope

This policy applies to all courses delivered at London School of Management and Media at all its centres and affiliate centres worldwide.

Declaring Conflicts of Interest

All staff and stakeholders are required to immediately report any interest that may conflict with their duties and responsibilities to their line manager or other member of the management team. If staff have any doubt as to a possible conflict of interest this must be discussed with their line manager or other member of the management team.

Staff and stakeholders will be required to complete an annual written Conflict of Interest Declaration, disclosing any actual or potential conflict of interest. In addition, staff may be reminded and asked to declare conflicts of interest during formal meetings such as exam boards and/or standardisation meetings.

Managing Conflicts of Interest

We will take all reasonable steps to ensure that no conflict of interest causes or has the potential to cause an adverse effect, and should this happen, we will take all reasonable steps to mitigate the impact and inform the relevant awarding organisation. Staff with a personal interest in the outcome will be excluded from carrying out malpractice investigations, appeals or other activities. Ongoing monitoring activities include:

- regular review of declared conflicts of interest.
- internal quality assurance monitoring of learner assessment, markers/assessors.
- Learner work will be subject to external quality assurance by the awarding organisation.

Confidentiality

All staff and stakeholders must ensure the security of information and preserve confidentiality of all personal data, activities, meetings, documentation and records. Staff and stakeholders must not copy or distribute copies of any LSMM material or assessment materials relating to qualifications to external parties unless authorised to do so.

Learner and other individual personal data must never be disclosed or shared unless authorised to do so.

Any breaches of confidentiality must be reported immediately to a member of the management team. Anyone with a personal interest in the outcome of the investigation into potential breaches of confidentiality will be prohibited from carrying out investigations of suspected or alleged breaches of confidentiality.

Reporting to the Awarding Organisation

Any identified potential or actual conflicts of interest or breach of confidentiality that have or may have the potential to cause an adverse effect will be reported to the relevant awarding organisation, who may then issue guidance or instruction on actions required to mitigate against any such effect.

Retention of Records

We will retain a record of all potential or actual conflicts of interest and the steps taken to mitigate against any risk or adverse effect. These records are confidential but may be made available to the awarding organisation or its regulators.