

CONFLICT OF INTEREST POLICY

This policy is applicable to all students, staff and parents of The Wellington Academy.

DOCUMENT CONTROL

Responsible position:	Approved by:
Examinations Officer	Headteacher
Version number:	Date approved:
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Annually	September 2024

RELATED POLICIES AND DOCUMENTS

Policy Name

TWA - Internal appeals policy for non-examination assessments

JCQ – ‘Instructions for conducting non-examinations assessment’ [Instructions NEA 23-24 FINAL.pdf \(jcq.org.uk\)](#)

JCQ – ‘Instructions for conducting coursework’ [Coursework ICC 23-24 FINAL.pdf \(jcq.org.uk\)](#)

JCQ – ‘Suspected malpractice Policies and Procedures’. [Malpractice Sep23 FINAL.pdf \(jcq.org.uk\)](#)

JCQ – ‘Access Arrangements and Reasonable Adjustments’ regulations’ [AA regs 23-24 FINAL.pdf \(jcq.org.uk\)](#)

JCQ – ‘Instructions for conducting examinations’ [ICE23-24-Sept23revision FINAL.pdf \(jcq.org.uk\)](#)

JCQ – ‘Instructions for GCSE and GCE MFL Listening Exams’ [MFL Listening 2023 FINAL.pdf \(jcq.org.uk\)](#)

JCQ - Invigilator checklist’ [JCQ-Invigilation-training-checklist-FINAL.pdf](#) https://www.jcq.org.uk/wp-content/uploads/2023/08/JCQ-Exam-Day-Checklist_FINAL.docx

JCQ - [Information for candidates documents - JCQ Joint Council for Qualifications](#)

JCQ - ‘Joint Contingency Plan’ [Joint Contingency Plan \(jcq.org.uk\)](#)

REVISION RECORD

Date	Version	Revision Description
September 2023	1.0	Written in line with current processes and legislation

POLICY CONTENTS

1. The Scope of this Policy
2. Managing and Declaring Conflicts of Interest
3. Examples of Conflict of Interest in Relation to the Delivery of Vocational Qualifications
4. Declaration of Conflict of Interest
5. Reporting of Conflict of Interest and Keeping Records.

1. THE SCOPE OF THIS POLICY

A Conflict of Interest exists in relation to an awarding organisation where:

- (a) Its interests 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 of the development, delivery and award of qualifications in accordance with its Conditions of Recognition (of the awarding organisation.)
- (b) 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 in accordance with the awarding organisation's Conditions of Recognition.
- (c) An informed and reasonable observer would conclude that either of these situations was the case.
- (d) The conflict of interest process is designed to protect the integrity of the exams system and also helps to ensure that staff members at schools and colleges are protected if there is an allegation of malpractice due to a perceived, or real, conflict.

Full details of the regulations can be found in the [JCQ General Regulations for Approved Centres Booklet](#) in section 5.3 (i), which you should read in addition to this policy.

2. MANAGING AND DECLARING CONFLICTS OF INTEREST

It is the responsibility of all staff at each centre to declare all conflicts of interest ahead of the published deadline for entries for each examination series. Any undeclared conflict of interest and instances where assessment has taken place where conflict of interest exists may be investigated in line with the relevant exam boards Malpractice and Maladministration Policy.

Any and all conflict of interest pertaining to the assessment of Vocational Qualifications will be declared to the relevant exam board. Each individual involved in the assessment process is responsible for declaring conflict of interest. Where the centre is able to mitigate against a declared conflict of interest, the mitigation will be included in the declaration.

In instances where the centre cannot mitigate against a Conflict of interest (for example, where the only qualified assessor and internal verifier available at a centre are related) the unresolved conflict will be declared to the relevant exam board to enable them to make arrangements to mitigate through the external quality assurance processes.

3. EXAMPLES OF CONFLICT OF INTEREST IN RELATION TO THE DELIVERY OF VOCATIONAL QUALIFICATIONS

Some possible examples of a conflict of interest may include:

- Where an assessor and the internal verifier have a personal relationship.
- Where a child of the assessor or internal verifier is taking part in the assessment.

This is not intended to be an exhaustive list.

4. DECLARATION OF CONFLICT OF INTEREST

All staff are requested to detail possible reasons for conflict of interest. They must declare any conflict to the Head of Centre in writing and the Head of Centre will determine what measures will be taken to mitigate any potential risk to the integrity of the affected qualifications.

5. REPORTING OF CONFLICT OF INTEREST AND KEEPING RECORDS

Awarding bodies will be informed about conflicts of interest before the published deadline for entries for **each examination series** including any members of school/college staff who are:

- taking qualifications which include internally assessed components/units at their own school/college
- teaching and preparing members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (eg children) for qualifications which include internally assessed components/units.

Entering members of staff for qualifications at their own school/college should be a last resort, when the individual has been unable to find an alternative. In this case the Head of Centre must ensure that:

- the usual protocols are in place to prevent the staff member from accessing exam materials prior to the exam, and that other staff understand the importance of maintaining the integrity and confidentiality of the exam materials
- the member of staff does not receive any preferential treatment.

Keeping records

The Head of Centre is responsible for ensuring that their school/college maintains clear records of all instances where:

- exams office staff have members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. children) being entered for examinations and assessments either at the school/college itself or other centre
- school/college staff are taking qualifications at their centre which do not include internally assessed components/units
- school/college staff are taking qualifications at other centres.

These records must:

- include details of the measures which have been put in place to mitigate any potential risk to the integrity of the affected qualifications
- be available for inspection by a visiting JCQ Centre Inspector and/or awarding body staff
- be available if requested in the event of concerns being reported to an awarding body
- be kept until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed (whichever is later).