



# Conflicts of Interest Policy (Exams)

All Saints School Lessingham

This policy is reviewed annually to ensure compliance with current regulations

|                      |            |
|----------------------|------------|
| Approved/reviewed by |            |
| Ms S Dangerfield     |            |
| Date of next review  | 04/12/2024 |

## Conflicts of Interest Policy (Exams)

|                            |                              |
|----------------------------|------------------------------|
| Centre name                | All Saints School Lessingham |
| Centre number              | 18324                        |
| Current policy approved by | Ms S Dangerfield             |
| Current policy reviewed by | Miss K King                  |
| Date of next review        | 04/12/2024                   |

### Key staff involved in the policy

| Role                        | Name                                                                               |
|-----------------------------|------------------------------------------------------------------------------------|
| Head of centre              | Ms S Dangerfield                                                                   |
| Senior Leader (s)           | Sian Jones<br>Karla King<br>Nicky Austin<br>Tom Lamb<br>Jo Paffett<br>Mark Pinsent |
| Exams officer               | Karla King                                                                         |
| Other staff (if applicable) | N/A                                                                                |

This policy is reviewed and updated annually to ensure that conflicts of interest at All Saints School Lessingham are managed in accordance with current requirements and regulations.

Reference in the policy to GR relates to relevant sections of the current JCQ publication General Regulations for Approved Centres.

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## Introduction

It is the responsibility of the head of centre to ensure that All Saints School Lessingham has a written conflicts of interest policy in place available for inspection. This policy confirms that All Saints School Lessingham:

Manages conflicts of interest by informing the awarding bodies, before the published deadline for entries for each examination series, of:

- any members of centre staff who are taking qualifications at their own centre which include internally assessed components/units
- any members of centre staff who are teaching and preparing members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications which include internally assessed components/units and 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. son/daughter) being entered for examinations and assessments either at the centre itself or other centres
- centre staff are taking qualifications at their own centre which do not include internally assessed components/units
- centre staff are taking qualifications at other centres (GR 5.3)

## Purpose of the policy

The purpose of this policy is to confirm how All Saints School Lessingham manages conflicts of interest under normal delivery arrangements in accordance with the regulations.

## General principles

A process is in place to collect any conflict of interest information for the current academic year from all centre staff to identify and manage and potential conflicts of interest in relation to exams.

## Declaration process

An electronic copy of the declaration of interest form is sent to all centre staff, working directly with KS4 students, during the autumn term. Completed forms must be returned to Karla King (Exams Officer) by October half term

## Managing conflicts of interest

A conflicts of interest log is maintained and any potential conflict declared by centre staff is centrally recorded on the log. The relevant awarding body/bodies is/are informed (where required by the nature of the conflict) of specific conflicts of interest/centre staff declarations before the published deadline for entries for each examination series by identifying and following the individual awarding body's administrative process. The agreed measures/protocols taken/put in place to mitigate any potential risk to the integrity of the qualifications affected are recorded on the log and the affected member of staff informed of these measures/protocols.

Additional information: N/A

**Roles and responsibilities** - The role of the head of centre

- Ensure conflicts of interest are managed according to the requirements (GR 5.3)
- Ensure clear records are maintained and that the records include details of the measures taken to mitigate any potential risk to the integrity of the qualifications affected (GR 5.3)
- Ensure the records are available where they may be requested by a JCQ Centre Inspector and/or awarding body staff (GR 5.3)
- Ensure the records are retained until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later (GR 5.3).
- Ensure that entering members of centre staff for qualifications at this centre is as a last resort in cases where the member of centre staff is unable to find another centre
- Ensure that proper protocols are in place to prevent the member of centre staff having access to examination materials prior to the examination and that other centre staff are briefed on maintaining the integrity and confidentiality of the examination materials
- Ensure that during the examination series the member of centre staff is treated in the same way as any other candidate entered for that examination, does not have access to examination materials and does not receive any preferential treatment (GR 5.3)

Additional responsibilities:

Ensure that centre staff are aware of the requirement to declare any interest - Ensure that declarations are recorded/logged as potential conflicts of interest

#### **The role of the exams office/officer**

- Ensure the process for collecting declarations of interest is undertaken.

Identify and follow the awarding body's administrative process for submitting details of members of staff who are:

- Taking qualifications which include internally assessed components/units at their own centre
- Teaching and preparing members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications which include internally assessed components/units (GR 5.3)
- Retain the records of the measures taken to mitigate any potential risk to the integrity of the qualifications affected until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later (GR 5.3)

Additional responsibilities:

Not applicable.

## **Changes 2023/2024**

Reference added to the requirement for a conflicts of interest policy to be in place available for inspection (as detailed in JCQ's General Regulations for Approved Centres, section 5.3z).

## **Centre-specific changes**

Upon review in September 2023, no centre-specific updates or changes were applicable to this document.

## Appendix 1

### DECLARATION OF INTEREST FORM 2024/25

To comply with the regulations, the centre is required to manage conflicts of interest<sup>1</sup> by informing the awarding bodies (before the published deadline for entries for each examination series) of:

- any members of centre staff who are taking qualifications at their own centre which include internally assessed components/units
- any members of centre staff who are teaching and preparing members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications which include internally assessed components/units, **and**

**maintains internal 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. son/daughter) being entered for examinations and assessments either at the centre itself or other centres
- centre staff are taking qualifications at their own centre which **do not** include internally assessed components/units
- centre staff are taking qualifications at other centres

To ensure compliance, you must declare (by ticking) any of the statements that apply to you and complete the required information in the white boxes.

|                                                   |  |                           |  |
|---------------------------------------------------|--|---------------------------|--|
| Your name                                         |  | Your job title(s)/role(s) |  |
| Subject(s) you teach (if applicable to your role) |  |                           |  |
|                                                   |  |                           |  |

Please tick any statement/statements that applies/apply to you and complete the required information (or will apply to you during the **2024/25** academic year)

- I am taking a qualification(s) at this centre which includes an internally assessed component/unit

| Qualification(s) I am taking                                                    | Awarding body | Qualification type | Specification (Subject) |
|---------------------------------------------------------------------------------|---------------|--------------------|-------------------------|
|                                                                                 |               |                    |                         |
| Steps I have taken to seek another centre at which to take the qualification(s) |               |                    |                         |
|                                                                                 |               |                    |                         |

- I am teaching and preparing a member of my family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for a qualification(s) which includes an internally assessed component/unit

(Where more than one related person, please complete a separate form)

| Name of related person (the candidate) |               |                    |                         |
|----------------------------------------|---------------|--------------------|-------------------------|
| Candidate number                       |               | Relationship to me |                         |
| Qualification(s)                       | Awarding body | Qualification type | Specification (Subject) |
|                                        |               |                    |                         |

<sup>1</sup> (Guidance for Centres on Managing Conflicts of Interest) [The conflict of interest process is designed to protect the integrity of the exams system and also helps to ensure that staff members in centres are protected if there is an allegation of malpractice due to a perceived, or real, conflict.](#)

|                               |  |  |  |
|-------------------------------|--|--|--|
| being taught and prepared for |  |  |  |
|-------------------------------|--|--|--|

- I am a member of exams office staff and have a member of my family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) being entered for examinations and assessments at this centre or another centre

(Where more than one related person, please complete a separate form)

|                                           |                                                                                                             |                                   |  |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------|-----------------------------------|--|
| Name of related person (the candidate)    |                                                                                                             |                                   |  |
| Where the candidate is being entered      | <input type="checkbox"/> This centre <input type="checkbox"/> Another entering centre (tick box as applies) |                                   |  |
| Candidate number (if this centre)         |                                                                                                             | Relationship to me                |  |
| Entering centre name (if not this centre) |                                                                                                             | Entering centre number (if known) |  |

- I am taking a qualification at this centre which does not include internally assessed components/units
- I am taking a qualification at another centre

| Qualification(s) I am taking | Awarding body | Qualification type | Specification (Subject)           | Exam series |
|------------------------------|---------------|--------------------|-----------------------------------|-------------|
|                              |               |                    |                                   |             |
| Entering centre name         |               |                    | Entering centre number (if known) |             |

- I have none of the above statements to declare

Date declaration(s) made:.....Signature to confirm declaration(s):.....

This completed form (including date and signature) must be returned to Karla King by October half term

The declaration(s) you have provided will be used to inform the relevant awarding body/bodies (where required) and to maintain internal records detailing of the measures taken to mitigate any potential risk to the integrity of the qualifications affected. You will be informed if/where any measures or protocols put in place directly affect you.

## Appendix 2:

### Relationships with Students Outside of Work Declaration template 2024/25

It is recognised that there may be circumstances whereby employees of the school are known to pupils outside of work.

Staff must declare any relationship outside of the school that they may have with students.

| Employee Name | Student Name | Relationship |
|---------------|--------------|--------------|
|               |              |              |
|               |              |              |

I can confirm that I am fully aware of the code of conduct relating to contact out of the school with pupils in line with this policy.

If I am tutoring a pupil outside of the school, I am aware that the following must be adhered to:

- I do not, at any point, teach the child in question as part of my daily timetable – this is a stipulation of such tutoring
- I emphasise to parents that this is done completely independently of the school
- no monies come through the school at any point, either informally (e.g. via the pupil) or formally
- no private tutoring has/will take place on the school premises.

I confirm that if these circumstances change at any time, I will complete a new form to ensure the school are aware of any relationships.

**Full Name**

---

**Current Position**

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**Signed by** \_\_\_\_\_

**Date** \_\_\_\_\_

Once completed, signed and dated, please return this form to Karla King (Operations Manager)



## Appendix 3:

### Summary of Mitigations for Each Type of Conflict of Interest 2024/25

| Conflict of interest                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Mitigations in place to mitigate any potential risk to the integrity of the qualifications affected                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>(As a last resort where unable to find another centre)<br/> <b>Member of centre staff is taking a qualification(s) at this centre which includes an internally assessed component/unit</b></p> <p><input type="checkbox"/> Conflict of interest declared to relevant awarding body before the published deadline for entries (for each affected examination series)</p>                                                                                                         | <ul style="list-style-type: none"> <li>• The member of centre staff is prevented from having access to confidential examination/assessment materials prior to exam(s)/assessment(s)</li> <li>• The centre briefs other staff on maintaining the integrity and confidentiality of exam/assessment materials</li> <li>• The member of centre staff is treated in the same way as any other candidate entered for that qualification, does not have access to examination materials and does not receive any preferential treatment</li> </ul>                                                                                                                                                                                                                                                                                        |
| <p><b>Member of centre staff is teaching and preparing a member of family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for a qualification(s) which includes an internally assessed component/unit</b></p> <p><input type="checkbox"/> Conflict of interest declared to relevant awarding body before the published deadline for entries (for each affected examination series)</p> | <ul style="list-style-type: none"> <li>• Every effort is made to avoid situations where a candidate is assessed by a person who has a close personal relationship with the candidate</li> <li>• The member of centre staff is not solely involved in making assessment decisions for the affected candidate for any internally assessed component/unit</li> <li>• The marked work of the affected candidate is submitted for moderation whether or not it is part of the moderation sample</li> </ul>                                                                                                                                                                                                                                                                                                                              |
| <p><b>Member of centre staff is a member of exams office staff and has a member of family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) being entered for examinations and assessments at this centre or another centre</b></p>                                                                                                                                                      | <ul style="list-style-type: none"> <li>• The member of exams office staff does not have unaccompanied access to confidential examination materials (for example, question papers, pre-release materials, answer scripts, etc.) for the qualifications in question on the days of these exams</li> <li>• On the days of exams in the qualifications in question, another person confirms and signs/dates that the exam packs remain sealed and have not been opened</li> <li>• The member of exams office staff commits to not contacting their family member on the morning or afternoon of exams in the qualifications in question</li> <li>• If the candidate is sitting the exams at this centre, another person is present for particular administrative arrangements relating to the candidate's exams/assessments</li> </ul> |
| <p><b>Member of staff is taking a qualification at this centre which does not include internally assessed components/units</b></p>                                                                                                                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>• The member of centre staff is prevented from having access to confidential examination materials prior to exam(s)</li> <li>• The centre will brief other relevant centre staff on maintaining the integrity and confidentiality of examination materials</li> <li>• The member of centre staff is treated in the same way as any other candidate entered for that qualification, does not have access to examination materials and does not receive any preferential treatment</li> </ul>                                                                                                                                                                                                                                                                                                 |
| <p><b>Member of staff is taking a qualification at this centre which does not include internally assessed components/units</b></p>                                                                                                                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>• The member of centre staff is prevented from having access to confidential examination materials prior to exam(s)</li> <li>• The centre will brief other relevant centre staff on maintaining the integrity and confidentiality of examination materials</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

|                                                                    |                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                    | <ul style="list-style-type: none"> <li>The member of centre staff is treated in the same way as any other candidate entered for that qualification, does not have access to examination materials and does not receive any preferential treatment</li> </ul> |
| <b>Member of staff is taking a qualification at another centre</b> | The member of centre staff does not have access to centre confidential examination materials for the same awarding body qualification if this is delivered in the centre                                                                                     |

## Appendix 4:

### CONFLICTS OF INTEREST LOG 2024/25

| Date recorded | Staff name & job title(s)/role(s) | Conflict of interest (COI) | Measures taken/protocols in place to mitigate any potential risk to the integrity of the qualifications affected |
|---------------|-----------------------------------|----------------------------|------------------------------------------------------------------------------------------------------------------|
|               |                                   |                            |                                                                                                                  |
|               |                                   |                            |                                                                                                                  |
|               |                                   |                            |                                                                                                                  |
|               |                                   |                            |                                                                                                                  |
|               |                                   |                            |                                                                                                                  |
|               |                                   |                            |                                                                                                                  |
|               |                                   |                            |                                                                                                                  |
|               |                                   |                            |                                                                                                                  |
|               |                                   |                            |                                                                                                                  |

(General Regulations for Approved Centres, 5.3j) The head of centre **must** retain records of all conflicts of interest including details of the measures taken to mitigate any potential risk to the integrity of the qualifications affected. The records may be inspected by a JCQ Centre Inspector and/or awarding body staff. They might be requested in the event of concerns being reported to an awarding body. The records **must** be retained until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later.