



# YSGOL BRO GWAUN

## Conflict of Interest (Examinations) Policy Polisi Gwrthdaro Buddiannau (Arholiadau)

Adolygiad/Review: Blynnyddol / Annually

Adolygiad nesaf/Next Review: May 2025

Wedi Cytuno gan Bwyllgor y Llywodraethwyr

Approved by Governors Committee

Arwyddwyd/Signed:

Pennaeth/Headteacher: \_\_\_\_\_

Llywodraethwr/Governor: \_\_\_\_\_

Dyddiad/Date: \_\_\_\_\_

09/05/2024

**CONFLICT OF INTEREST (EXAMINATIONS) POLICY**  
**POLISI GWRTHDARO BUDDIANNAU (ARHOLIADAU)**

Rheoli Dogfennau / Document Control :

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1.0		Creation of Policy	
	09.05.24		

Mae copi cyflawn o'r polisi hwn ar gael o swyddfa'r ysgol ar gais, gyda dyddiad cymmeradwyaeth, dyddiad adolygu a llofnod bob rhanddeiliad oedd yn rhan o cymmeradwyaeth polisi.

A complete copy of this policy is available from the school office upon request, they include an approval date, a review date and signatures of all stakeholders involved in the approval of the policy.

## Introduction

As detailed in section 5.3z of the **General Regulations for Approved Centres: 1 September to 31 August 2024**, published by the Joint Council of Qualifications (JCQ), there is the requirement for a conflicts of interest policy to be in place and available for inspection. It is the responsibility of the head of centre to ensure that there is a written conflicts of interest policy.

Ysgol Bro Gwaun supports staff who work for Awarding Organisations (exam boards). Such work is professionally fulfilling, provides opportunities for career development and helps ensure the high quality operation of the public exams system on which thousands of candidates and schools depend for fair and accurate results. It is also recognised that work for Awarding Organisations may put colleagues in a position where a conflict of interest may exist due to access to privileged information.

This policy confirms that Ysgol Bro Gwaun:

- 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 at either the centre itself or other centres;
  - centre staff are taking qualifications at their own centre which do not include internally assessed components/units; and
  - centre staff are taking qualifications at other centres. (GR 5.3)

In this policy, GR 5.3 relates to relevant section of the current JCQ publication **General Regulations for Approved Centres**.

This policy is reviewed and updated annually on the publication of updated JCQ regulations.

## Purpose of the Policy

As a registered exam centre, Ysgol Bro Gwaun is required to take all reasonable steps to ensure that any conflicts of interest in relation to the delivery and awarding of examinations/assessments are identified, recorded and managed effectively.

A conflict of interest occurs where any member of staff who has access to privileged information, or is responsible for making decisions about assessment outcomes, could, potentially, use that information, or their position, to give an unfair advantage to students with whom they have a

professional connection and who are entered for an examination/assessment at the centre or any other centre.

A potential conflict of interest also occurs where a member of centre staff is entered for an examination/assessment.

The purpose of this policy is to confirm how Ysgol Bro Gwaun manages conflicts of interest under normal delivery arrangements in accordance with the regulations.

## General Principles

A process is in place to collect any declarations of interest, including those relating to associations with students outside of school, from all centre staff to enable the centre to identify and manage any potential conflicts of interest.

## Roles and Responsibilities

**The role of the Head of Centre is to ensure that:**

- conflicts of interest are managed according to the requirements; (GR 5.3)
- 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)
- the records are available where they may be requested by a JCQ Centre Inspector and/or awarding body staff; (GR 5.3)
- 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)
- 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;
- 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; and
- 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)

**The role of the Exams Officer is to:**

- ensure that 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; and/or
  - 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 (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)

## Categories of examination duty

There are broadly four categories of examining duties:

- A. Teachers involved in the preparation of exam papers (question setting, reviewing, vetting) – i.e. teachers who see question papers before an exam is sat.
- B. Teachers who mark public exams but who only see question papers and scripts after the exam has been sat (e.g. assistant examiners).
- C. Staff involved in checking examination material prior to the exam (e.g. exams officers, lab technicians for practicals, etc.).
- D. Teachers involved in the marking and moderation of internally assessed coursework.

Teachers involved in category A and B work are required to register this work with the examinations officer and through the Assistant Headteacher responsible for Assessment. Teachers who carry out category A work must obtain the express approval of the Headteacher who will meet with such teachers to discuss the points outlined under Category A Work, below.

All staff involved in category A, B, C, and D public exam work must follow all centre, exam board, JCQ and regulator regulations in full. The integrity of the exam process is critical and no actions should be taken that either undermine, or appear to undermine, the fairness and integrity of public exam assessment. As a registered centre for examinations, Ysgol Bro Gwaun and its staff must maintain the highest professional standards at all times.

## Whistleblowing

- Anyone concerned about the integrity of any aspect of the public exams process should raise these concerns with the relevant authority in the exam board / JCQ / regulator.
- Concerns about the conduct of exams at the school should be raised with the Head of Centre and Exams Officer.
- If a concern relates to the Head of Centre then the Chair of Governors should be contacted. Concerns should be addressed in a reasonable and timely fashion; if they are not, the concern should be escalated in accordance with the school's Whistleblowing Policy.

## Category A work

Teachers who are involved in the production, review and checking of examination material prior to assessment undertake work that is essential to the smooth and accurate running of the public exams system. However, they also face conflicts of interest that require very careful management to preserve the integrity of the exams system and safeguard the professional standards and reputations of teachers and their schools or colleges.

All category A work must be done in accordance with exam board / JCQ / regulator regulations. Where exam boards provide training for how to manage conflicts of interest, staff must complete this training to protect themselves and the integrity of the public exam system. Above and beyond the requirements of exam board / JCQ / regulators, category A teachers must follow the relevant starred practical measures below.

- a. \* Do not inform pupils and parents of category A work. Keeping exam setting / checking work confidential (but notifying the school/college and appropriate colleagues of such work) safeguards against student and / or parent questioning / intrusion.
- b. \* Always set past examination questions, or questions that are on publicly available sample papers.
- c. \* Always cover the whole specification (where appropriate); never question spot.
- d. \* Never discuss future examinations with students, parents and / or colleagues.
- e. \* All internal assessment papers should be set by a member of the department not involved in setting public exam papers.
- f. \* Never give any indication of what is in a future paper, by suggesting what, or what not, to revise.
- g. \* Where students write essays, ensure there is an explicit and transparent mechanism for the choice of essay, e.g. essays chosen by pupils or other department staff.
- h. \* Do not use school/college IT resources for any category A work.
- i. \* **Never complete category A work in school.**
- j. \* Examination advice given to students should be based only on material which is available to all centres (e.g. examiners' reports, mark schemes, etc.).
- k. \* Category A staff should withdraw from any discussion that could lead to a conflict of interest – for example the contents of a revision schedule.
- l. \* Staff with any concerns about the integrity of their category A work, or conflicts of interest arising, should protect themselves and the exams system by raising such concerns with the exam board. If in doubt proactively report.

The starred practical guidance can limit a teacher's ability to discharge his / her teaching and departmental duties. This is especially so if the category A worker is a head of department, or works in a smaller department where there may not be sufficient other colleagues to fill workload gaps created by a 'conflicted' member of staff. In such circumstances it may not be possible for a teacher to carry out category A work; they may instead carry out category B roles.

### **Attending examiner meetings / completing examination work (Category A and B work)**

Whilst we actively encourage and support teachers who undertake public exam work, it is important that this additional 'private' work does not compromise teaching, pastoral, administrative and extra-curricular duties. Teachers must endeavour to minimise their time out of school for examiners' meetings and ensure there is minimal disruption to their work for the school.

### **Category C and Category D work**

Any member of staff involved in these processes must adhere to the JCQ procedures and follow all instructions provided by the Examination Boards and JCQ precisely. If one of these members of staff has a relation or is tutoring a candidate in Year 11 or the relevant year group who is sitting the

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examination, whether at Ysgol Bro Gwaun or any other Secondary/High School, a conflict of interest must be recorded.

### **Familial conflicts of interest**

Should any member of school staff involved with the preparation for or delivery of examinations have a close relative who is in Year 11 or any other year group who is sitting the examination, a conflict of interest must be declared.

### **Professional conflicts of interest**

Should any member of school staff involved with the preparation for or delivery of examinations be tutoring a candidate who is in Year 11 or any other year group who is sitting the examination, a conflict of interest must be declared.

### **Centre staff sitting examinations**

Any centre staff who are sitting examinations, either at this centre or another, must declare an interest.

### **Declaration Process**

A form is used to collect declarations of interest and this is sent to staff in September of each year. This information is reviewed and centrally recorded by the Head of Centre and the Exams Officer.

### **Managing Conflicts of Interest**

A record of conflicts of interest is maintained by the Exams Officer.

The relevant awarding bodies are informed (where required by the nature of the conflict) of specific conflicts of interest/centre staff declarations by 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.



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**Appendix A - Declaration of Personal Interest form**

Your name		Your job role(s)	
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This completed form must be returned to the Exams officer (either on paper in person or electronically returned to Wendy Davies by email by **XXXXXXXXXXXXXX**)

Confirm your understanding: (Please tick or place an X in the box to confirm a statement)

	I understand that a personal interest relates to a candidate who is a member of my family (which includes stepfamily, foster family and similar close relationships)
	I also understand that a personal interest may also relate to any member of centre staff (who has been entered for a qualification at this centre as a last resort where the member of centre staff is unable to find another centre)

You must declare all statements that apply to you: (Please tick or place an X in the box to confirm a statement)

	I have no personal interest in a candidate to declare
	I declare a personal interest in a candidate who is part of a class or cohort for whom I will be:
	Head of Department/AoLe
	Teacher
	Learning Support Assistant
	Head of Centre
	Exams officer
	Data manager
	ALN department – involved in Access Arrangements
	Administrator – please state role: _____
	I declare a personal interest in a candidate I tutor who is sitting examinations at this centre
	I declare a personal interest in a private candidate who has been entered for a qualification at this centre
	I declare a personal interest in a candidate who is sitting examinations at another examination centre

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

Name of related person (the candidate)	
Candidate number (if known)	
Relationship to me	
School (examination centre) the candidate attends	

**Signature to confirm declaration:** \_\_\_\_\_

**Date declaration form completed and signed:** \_\_\_\_\_

You will be informed of any additional controls put in place that directly affect you/your role to mitigate any potential risk to the integrity of the examination process, results download or post-results reviews and appeals.

This record will be retained until the published deadline for appeals has passed or until any on-going appeal, malpractice investigation or other results enquiry has been completed, whichever is later.



### Appendix 2: Summary of Mitigations for Each Type of Conflict of Interest

Conflict of Interest	Mitigations to be in place to maintain integrity of the qualifications affected
<p>(As a last resort where unable to find another centre) <b>Member of centre staff is taking a qualification(s) at this centre which includes an internally assessed component/unit</b></p> <p>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) or tutoring a candidate for a qualification(s) which includes an internally assessed component/unit</b></p> <p>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 another centre</b></p>	<ul style="list-style-type: none"> <li>• The member of centre staff does not have access to confidential examination materials for the same awarding body qualification if this is delivered in the centre.</li> </ul>

