



Conflict of Interest Policy 2025-26	
Reviewed by LAB on:	March 2026
Date of Next Review:	November 2026
Responsible Officer:	Ran Partock

Introduction and General Rationale

The conflict of interest policy is designed to protect the integrity of the exams system and also helps to ensure that staff are protected if there is an allegation of malpractice due to a perceived, or real, conflict.

Section 5.3j of the General Regulations for Approved Centres requires the head of centre to ensure that Comberton Village College:

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 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

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.

Heads of centre should note that entering members of centre staff for qualifications at their own centre **must** be as a last resort in cases where the member of centre staff is unable to find another centre.

The head of centre is responsible for ensuring 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.

The head of centre **must** 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.



This policy also outlines how Comberton Village College manages the potential conflict of interest of having teaching staff engaged in writing public examination questions.

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

The process

A *declaration of conflicts of interest* form (appendix 1) is sent electronically to all centre staff in advance of any formal examinations taking place in the centre. Completed forms must be returned in prior to the examinations starting.

There is a conflict of interest log, any potential conflicts declared are recorded on this log (appendix 2).

The relevant awarding bodies are informed (where required) of specific conflicts of interest before the published deadlines for entries for the exam series.

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.

Responsibilities

Head of centre:

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

Senior leaders

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

Exams 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
- 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

Centre staff:

- Complete the *declaration of conflicts of interest* form in advance of any formal examinations taking place in the centre.

Guidance to teachers who carry out work for Awarding Organisations

Introduction

Our centre 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. An in depth understanding of the marking process and nuances of mark schemes are of direct teaching and learning benefit to both teachers and students.

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 using the online conflict of interest form. Teachers who carry out category A work must obtain the express approval of the Principal who will meet with such teachers to discuss the starred items in section 4, 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. The centre and its staff must maintain the highest professional standards at all times.

Whistle blowing

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 college should be raised with the Head of Centre and the Exams Officer. If a concern relates to the Head of Centre then the Chair of the Local Advisory Body 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 Cam Academy Trust'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 Comberton Village College. 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**. These measures are based on many years of teachers' examiner experience.

- a* Do not inform pupils and parents of category A work. Keeping exam setting / checking work confidential (but notifying the 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 questionspot.
- 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 college IT resources for any category A work.
- i* Never complete category A work in college.
- 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. This will be discussed with the Principal as part of the approval process.

Attending examiner meetings / completing examination 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 college for examiners' meetings and ensure there is minimal disruption to their work for the college.



Appendix 1: declaration of conflicts of interest

Declaration of conflicts of interest

The conflict of interest policy is designed to protect the integrity of the exams system and also helps to ensure that staff are protected if there is an allegation of malpractice due to a perceived, or real, conflict.

A *declaration of conflicts of interest* form is sent electronically to all staff in advance of any formal examinations taking place in the centre.

This form must be completed at least once each academic year.

Qualifications I am taking myself

1. I am taking, or plan to take, a qualification this academic year

- Yes, with Comberton Village College as my exam centre
- Yes, at another exam centre
- No

2. The qualification I am taking, or plan to take, at Comberton Village College includes **internally-assessed components/units**.

- Yes
- No

3. Please provide details of the qualification(s) you are taking, or plan to take.

[Enter your answer]

Qualifications that members of my family or close friends are taking

(which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter)

4. I have family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) who will be entered this academic year for examinations/assessments, either at Comberton Village College or other centres;

- Yes
- No

5. I am teaching or preparing them for an examination or assessment at Comberton Village College

- Yes
- No

6. The qualification I am teaching or preparing them for includes internally-assessed components/units

- Yes
- No

7. I am involved in the administration of examinations or assessments that they will take at Comberton Village College

- Yes
- No

8. Please provide details of the candidates that meet the criteria described in this section

[Enter your answer]



Qualifications that I am involved in examining

9. I work for an awarding organisation

- Yes, and see questions before an exam is sat
- Yes, but only see questions after an exam is sat
- Yes, in some other capacity
- No

10. Please provide details of the work you do for awarding organisations

[Enter your answer]

Thank you

11. I understand that I need to complete another *declaration of conflicts of interest* form should my answers to these questions change this academic year

- I understand



Appendix 2: conflict of interest log

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.

Date recorded	Staff name and job title	Conflict of interest	Measures taken/protocols in place to mitigate any potential risk to the integrity of the qualifications affected