# Conflict of Interests Policy (Exams)

## Clarity Independent School

**Bridge Barn Farm**
**Woodhill Road**
**Sandon**
**CM2 7SG**

***Clarity Independent School is committed to safeguarding...***

*"Our school is committed to our whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do, and underpins all systems, processes and policies...We promote an environment where children and young people feel empowered to raise concerns and report incidents and we work hard in partnership with pupils, parents and caregivers to keep children safe."*

Clarity Safeguarding Policy September 2025

**Written by previous Deputy Head**

**This is version [3]**
**Written:** July 2023
**Updated Date:** September 2025
**Name:** Richard Clow


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# 1. Introduction

This policy enables Clarity Independent School to identify, manage and mitigate any potential conflict of interest. All staff and other individuals related to the school have a responsibility to be aware of the potential for a conflict of interest.

The policy is edited using the most recent publication of JCQ's regulations and guidance which is contained in the Access Arrangements and Reasonable Adjustments (AARA) for conducting examinations. Procedures for submitting a declaration of interest are subject to individual awarding body guidance and requirements. All schools must comply with these regulations.

For the purposes of this document, any reference to 'the school' will mean Clarity Independent School.

# 2. Purpose of the policy

The purpose of this policy is to provide guidance to staff and any other relevant individuals on handling possible conflicts of interest that may arise because of their roles as teachers, invigilators, and assessment/exam-related administrators. The policy is designed to protect the integrity of our qualifications and the assessment process. It applies to all staff or other individuals whenever they interact or potentially interact with any of the school's assessment/exam related functions. The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise because of the school's role in delivering courses.

This policy:

- Defines what is meant by 'conflict of interest' in this context.
- Describes the issues of conflict of interest in the context of working for the school in an assessment/exam related function or with, or for, an awarding organisation.
- Sets out which conflicts can be managed and how they should be managed, and those which are considered unmanageable and therefore cannot be allowed.
- Illustrates potential conflict of interest situations, some of which are not obvious.

# 3. Scope of Policy

3.1 This policy applies to staff and other individuals who interact or potentially interact with the assessment- related work/examinations of the school. This includes individuals involved with all aspects of devising, setting, marking, administering, invigilating, internally quality



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assuring or any other activity connected with the assessment of candidates and associated supporting resources and services.
3.2 The individuals falling within the scope of this policy include all staff employed by the school on a full-time, part-time, or casual basis.

## 4. Definition of 'Conflict of Interest'

4.1 A conflict of interest is a situation in which an individual has competing interests or loyalties, which could compromise or appear to compromise their decisions if it is not properly managed. In this context there is a potential conflict of interest when a member of staff has friends or relatives taking assessments or examinations, at this school or elsewhere. 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 a close friend or relative entered for an examination/assessment at the school or another centre.
4.2 The Joint Council for Qualifications (JCQ) use the term **'Related People'** to cover close friends and relatives. 'Related People' are those with whom the member of staff has a close relationship. It would certainly include spouses, children and siblings, but would also include close friends, relatives and members of the household where there is regular contact, such that privileged information might be shared inappropriately. A step-relative, cousin, niece/nephew etc. would count if the contact with that person was close and frequent.
4.3 A conflict of interest also occurs if any member of staff is entered for an examination or assessment at the school or elsewhere.

## 5. Principles

The school will:

- Review its processes annually to ensure that all conflicts of interest or potential conflicts of interest are managed and resolved.
- Ensure that anyone who has access to confidential assessment material for a qualification understands the confidential nature of the content.
- Ensure that all members of staff declare any interest for (friends, family or other 'Related People') sitting examinations.
- Ensure that no member of staff is asked to assess, invigilate or internally verify the work of a student who is a family member, other relative or close friend.


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- Ensure that no member of staff uses their role within the school to compromise the security and confidentiality of all assessment documents including examination papers.
- Ensure that no member of staff makes live assessment materials available to individuals, whether or not students at the school, when not specifically tasked with assessing them as part of a timetabled activity.

## 6. Responsibilities

- Line managers are responsible for ensuring that all new staff are aware of, and understand, the Conflict of Interest Policy. Any day-to-day concerns identified by an individual should be raised with their line manager.
- The Exams Officer will ensure that all JCQ requirements are adhered to and will maintain appropriate records accordingly (see **Appendix 1**).
- All individuals involved with the examinations delivery and procedures will be required annually to read and understand the Conflict of Interest Policy.
- ***The most important feature of the policy is the requirement that individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest.*** 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 a close friend or relative entered for an examination/assessment at the school or another centre.
- ***Prior to each examination series, all staff and other relevant individuals must inform the Exams Officer of any 'Related People' being entered for examinations at the school and also at any other examination centre, during that exam series, if there is a potential conflict of interest.*** They do this by completing the form in Appendix 2. Communication should be directly to the school's Exams Officer who will liaise with the Head of Centre and the Assessment Co-ordinator. ***Disclosures should be made as soon as potential or actual conflict is discovered.***
- Any concerns that the individual feels are urgent should be communicated immediately to the Head Teacher (Head of Centre) and may be done so in confidence. It is an individual's right to raise concerns relating to the conflict of interest directly with the senior leadership team and to receive a response to their concerns.

## 7. Equality Impact and Monitoring the Policy and Procedure

In monitoring the impact of this policy and procedure, the school will have due regard to its Equality Policy and the Public Sector Equality Duty. It will consider any concerns raised or



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complaints received, based on student and staff data, feedback, surveys and/or professional judgement. If you have a question or a suggestion to improve the policy, please contact the Exams Officer.

## 8. Related Policies and Guidelines

This policy is linked to our:

- Examinations Management Policy
- Examination Internal Appeals Policy
- Examination Contingency Plan
- Examinations Complaints and Appeals Procedure Policy
- Examinations Word Processing Policy
- Assessment Procedures Policy
- Non-examination Written Controlled Assessment Policy
- Equality Policy
- Staff Handbook
- Whistleblowing Policy
- Recognition of Prior Learning Policy and Process
- Student Recruitment, Identification, Registration and Certification Policy

This policy will be reviewed annually in accordance with JCQ and Pearson regulations. Overall responsibility for examinations in Clarity Independent School rests with the Headteacher, Debbie Hanson.


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**Appendix 1: Conflict of Interest log** Exam series .....

(for Exams Officer use)

| Date recorded | Staff name & job title(s) | Interest declared | Nature of any potential Conflict of Interest | Specific Conflict of Interest | Steps being taken to manage the risk represented by any Conflict of Interest |
|---|---|---|---|---|---|
| | *Example*<br><br>*body* | *Sitting exam/assessment at this centre* | | *Declared to awarding* | *The following protocols are in place:*<br><br>*(to prevent the member of staff having access to exam/assessment materials prior to the exam/assessment and that other centre staff are briefed on maintaining the integrity and confidentiality of the examination materials)* |
| | | | | | |
| | | | | | |

**This log will be saved (Desktop -> Clarity -> Conflict of Interest Log) and kept for a minimum of one year after results have been issued for the relevant exam series.**



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# For Head of Centre/Exams Officer Use Only

| Date | Action |
|---|---|
| | Completed declaration form received |
| | Recorded on Conflict of Interest log<br><br>Awarding body/bodies informed of specific Conflict of Interest (where applicable) |
| | Member of staff informed of steps to manage the risk represented by specific Conflict of Interest |
| | Completed declaration form received |



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# Appendix 2: Checking Conflict of Interest Amongst Staff Members

**Exam Centre:** Clarity Independent School. **Centre Number:** 16314.

**Pearson qualifications list 2025 – 2026:**

| | |
|---|---|
| GCSE Maths (9-1) Foundation Tier | NSCO Entry Level Science (ELC) |
| GCSE English Language 2.0 | Functional Skills English Levels 1 and 2 |
| GCSE Biology (9-1) Foundation Tier | Functional Skills Maths Levels 1 and 2 |
| GCSE Physics (9-1) Foundation Tier | Functional Skills English at Entry Level 1, 2 or 3 |
| GCSE Chemistry (9-1) Foundation Tier | Functional Skills Maths at Entry Levels 1, 2 or 3 |
| Digital Functional Skills at Level 1 | Digital Functional Skills at Entry Level 3 |

| **Name:** | **Job title (including examination roles):** | | |
|---|---|---|---|
| **Please indicate your response to each statement by ticking 'Yes' or 'No' in the appropriate box and provide further information if your response is 'Yes'.** | **Yes** | **No** | **Qualification name** |
| **1** Are ***you*** taking any of the qualifications (named above) at the exam centre that include internally assessed components/units? | | | |
| **2** Are you ***involved with*** teaching and preparing members of your family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications (named above) which include internally assessed components/units? | | | |
| **3** Are you taking any of the qualifications (named above) at the exam centre that ***does not*** include internally assessed components/units? | | | |
| **4** Are you taking any of the qualifications (named above) at ***another*** exam centre? | | | |
| **5** Are you taking any qualifications ***other*** than those named above where Pearson is the awarding body? | | | |

**Declaration:**

I confirm that the information I have provided is true to the best of my knowledge and that the centre will submit a declaration of interest to Pearson if the qualification includes internally assessed components or units. As a result, the work will be subject to moderation/verification.

**Print name:** **Signed:** **Date:**



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# Appendix 3: Declaration of Interest form (for staff use)

*The awarding bodies are required by the qualification regulators to ensure that any Conflict of Interest in relation to the design, delivery and awarding of examinations/assessments is identified, recorded and managed effectively. In turn, centres are required to take all reasonable steps to ensure that the awarding bodies are able to comply with this regulatory condition.*

*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 a close friend or relative entered for an examination/assessment at your or any other centre. A Conflict of Interest also occurs if any member of your centre's staff is entered for an examination/assessment.*

Therefore, centres are required to inform the awarding bodies for any of their specifications of any specific Conflict of Interest. To ensure our centre complies, 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) | |
|---|---|---|---|
| Subject(s) you teach *(if applicable to your role)* | | | |
| | | | |

❑ I will be sitting an exam/assessment at this centre in the Summer XXXX (year) exam series.

| Qualification(s) I am to be entered for | Awarding body | Qualification type | Specification (subject) |
|---|---|---|---|
| | | | |



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| | | | |
|---|---|---|---|
| Steps I have taken to seek an alternative centre at which to sit the qualification(s) | | | |
| | | | |

❑ I have access to confidential assessment materials (in the centre's secure storage facility and/or through an awarding body secure extranet site) and I am entered for an exam at another centre in the Summer XXXX (year) exam series.

| Qualification(s) I am to be entered for | Awarding body | Qualification type | Specification (subject) |
|---|---|---|---|
| | | | |
| Entering centre name | | | |
| Entering centre number | | | |

## 'Related People'

*'Related People' are those with whom you have a close relationship. It includes spouses, children and siblings, close friends, relatives and members of the household where there is regular contact, such that privileged information might be shared inappropriately. A step-relative, cousin, niece, nephew etc., would count if the contact with that person was close and frequent.*

❑ I have access to the centre's secure storage facility and I have a one or more 'Related People' sitting exams, at this centre or elsewhere (*where more than one related person complete a separate form).*

| | |
|---|---|
| Name of related person (the candidate) | |



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| Where the candidate is sitting | ☐ This centre ☐ Another entering centre *(tick box as applies)* | | |
|---|---|---|---|
| Candidate number (if this centre) | | Relationship to me | |
| Entering centre name | | | |
| Entering centre number (if known) | | | |

❑ I am involved in making assessment decisions for centre-marked components for 'Related People' (*where more than one related person, please complete a separate form).*

| Name of related person (the candidate) | | | |
|---|---|---|---|
| Candidate number (if this centre) | | Relationship to me | |
| Qualification(s) candidate to be entered for | Awarding body | Qualification type | Specification (subject) |
| | | | |

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

**Staff Name to Confirm Declaration(s):**

This completed form (including date and signature) must be returned to the school Exams Officer as soon as the potential conflict of interest is identified and certainly well before any assessment has taken place.

The declaration(s) you have provided will be used to inform the relevant awarding body/bodies where a specific Conflict of Interest is identified and to record the steps being taken by the centre to manage the risk represented by any Conflict of Interest. You will be informed where any steps directly affect you. All records are subject to inspection by the JCQ/awarding body on request and will be kept for a minimum of one year after results have been issued for the relevant exam series.


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