Conflict of Interest Policy (Exams)

CEO: Ruth Minhalll

Examinations Officer: Letitia Etherington

Date of Approval: September 2026

Next Review: September 2027

8 Roper Yard, Roper Road, Canterbury, CT2 7EX

info@tuition-extra.co.uk www.tuition-extra.co.uk

Contents

Purpose of the policy 3
Scope 3
Annual Declaration of Interests 4
What is a Conflict of Interest? 4
Roles, Responsibilities and Associated Procedures to be followed in the event of an Actual or Perceived Conflict of Interest 5
Reporting Conflicts to Awarding organisations 6
Handling Potential Conflicts of Interest in Specific Areas and Functions 7
Record Keeping 8

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 as a result of their roles as tutors, invigilators, and assessment/exam-related administrators. This policy applies to all staff or other individuals whenever they interact or potentially interact with any of the assessment/exam related functions.

This policy:

- Defines what is meant by conflict of interest in these circumstances.
- Describes the role of conflict of interest in the context of working for Tuition Extra (Kent) Ltd in an assessment/exam related function.
- 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.

The most important feature of the policy is the instruction that individuals should always disclose an activity if there is any doubt about whether it represents a conflict of interest. This policy is reviewed annually to ensure compliance with the current JCQ General Regulations for Approved Centres and awarding organisation requirements. The Head of Centre is responsible for ensuring that conflicts of interest are identified, recorded, managed and, where required, reported to awarding organisations.

The policy describes how and when such disclosures should be made, that is, as soon as potential or actual conflict is discovered. This should be done by completion of a report at the time (i.e. before activity is carried out). The policy describes the procedures that should be followed and how to handle potential conflicts of interest.

Scope

This policy applies to staff and other individuals who interact or potentially

interact with the assessment- related work/examinations of Tuition Extra (Kent) Ltd. This includes individuals involved with all aspects of devising, setting, marking, administering, invigilating, internally verifying or any other activity connected with the assessment of candidates and associated supporting resources and Services.

The individuals falling within the scope of this policy include full-time, part-time, pro-rata and support staff of Tuition Extra (Kent) Ltd and any associate staff including external examiners.

The content of the policy cannot cover every potential conflict and must be interpreted in the light of the particular circumstances of each conflict.

Annual Declaration of Interests

- All staff involved in examinations, assessments and examination administration are required to complete an annual declaration of interests.
- Staff must immediately update their declaration should circumstances change during the academic year.
- The Examinations Officer will maintain a central Conflicts of Interest Register recording all actual, potential or perceived conflicts and the actions taken to manage them.
- The declaration must specifically identify any involvement in conducting internally assessed or externally assessed Speaking, Listening or Oracy components or units, including where the candidate is a family member, other relative or close friend.

What is a Conflict of Interest?

A simple definition of conflict of interest is a situation in which an individual or organisation has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances, for example:

- An individual whose personal interests conflict with his/her professional position

- An individual scheduled to assess, invigilate or internally verify the work of friends and/or relatives

Roles, Responsibilities and Associated Procedures to be followed in the event of an Actual or Perceived Conflict of Interest

All relevant staff have a responsibility to be aware of the potential for a conflict of interest.

The Head of Centre will ensure that all relevant centre staff are aware of this policy and understand their responsibility to declare any actual, perceived or potential conflict of interest.

The Examinations Officer and Human Resources Department will maintain records of conflicts of interest and ensure that relevant information is retained in accordance with JCQ requirements.

It is possible that staff working in any assessment/exam related role might encounter potential conflicts of interest from time to time.

Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on standards of, or public confidence in, Tuition Extra (Kent) Ltd's educational provision or that of the integrity of the qualifications.

Staff can find themselves in potential conflict of interest situations because they are not clear what the correct, auditable processes and procedures are:

- The Conflict of Interest policy is a requirement of the induction of all new tutors, invigilators and assessment/examination related support staff. As and when the situation arises, tutors, invigilators and support staff must notify Tuition Extra (Kent) Ltd of any students that are family members, other relatives or close friends (which includes step-family, foster family and similar close relationships and their immediate family, e.g. son/daughter).

- This requirement also applies to staff conducting internally or externally assessed

Speaking, Listening or Oracy components and units

- Any day-to-day concerns identified by an individual should be raised with the Management Team.
- Where there is a notified potential conflict of interest for an individual, the individual and a member of the Management Team must document this carefully, together with details of the measures taken to mitigate any potential risk to the integrity of the qualifications affected and/or those activities that must be avoided to prevent Tuition Extra (Kent) Ltd being brought into disrepute.
- A Disclosure of Conflict of Interest Form should be signed by both the individual and the member of the Management Team and brought to the attention of the Head of Centre. The records will be retained until the deadline for reviews of marking has passed or until any appeal, malpractice, JCQ Centre Inspector review or other results enquiry has been completed, whichever is later.

- Any concerns that the individual feels are urgent should be communicated immediately to the Head of Centre and may be done so in confidence. It is an individual's right to raise concerns relating the conflict of interest directly with the Head of Centre and to receive a response to their concerns.

Reporting Conflicts to Awarding organisations

Where required by JCQ regulations, awarding organisations will be informed of relevant conflicts of interest before the published deadline for entries or as soon as the conflict becomes apparent.

This includes:

- Members of centre staff taking qualifications at their own centre that include internally assessed components or units.
- Members of centre staff teaching, preparing or assessing family members, close friends, or their immediate family members for qualifications containing internally assessed components or units.

- Members of centre staff conducting internally assessed or externally assessed Speaking, Listening or Oracy components or units, including where they are related to or teach the candidate being assessed.

The Head of Centre will ensure that appropriate mitigation measures are documented and implemented.

Handling Potential Conflicts of Interest in Specific Areas and Functions

The following are examples of conflicts or potential conflicts of interest from different areas of Tuition Extra (Kent) Ltd. These notes are intended to be helpful to staff in making decisions that relate to potential conflict of interest situations in their day-to-day work.

If a teaching member of staff is involved in any way with the development of a secure assessment for either internal or national use, he/she cannot make use of the knowledge of that assessment in any teaching or learning activity.

- If tutors, invigilators and assessment/exam-related administrators do not take responsibility to ensure the security and confidentiality of all assessment documents including examination papers.
- Learning and teaching materials are based on live examination of other assessment materials (although they can make use of past examination papers of other assessment materials).
- If a member of staff is asked to teach, prepare, assess, invigilate or internally verify the work of a student who is a family member (which includes step-family, foster family and similar close relationships), other relative (e.g. son/daughter) or close friend.
- any members of centre staff who are taking qualifications at their own centre which include internally assessed components/units;
- any members of centre staff conducting internally assessed or externally assessed Speaking, Listening or Oracy components/units, particularly where the candidate is a family member, other relative or close friend;
- A member of staff makes assessment materials available to individuals, whether or not students of Tuition Extra (Kent) Ltd, when not specifically tasked with

assessing them as part of a timetabled activity.

- Exams Office staff must declare where a family member, close friend or immediate family member is entered for examinations or assessments at this centre or another centre.
- Members of the Senior Leadership Team, SEND staff, access arrangements staff, invigilators and examinations staff must declare any conflict that could affect the integrity of assessment or examination processes.
- Staff engaged in private tutoring of candidates entered at the centre must declare this relationship.
- Any staff member with access to confidential examination materials must declare circumstances that could result in an actual, perceived or potential conflict of interest.
- Appropriate control measures may include removal from access to confidential materials, allocation of alternative assessors, alternative invigilation arrangements or additional monitoring.

Record Keeping

The centre will maintain a Conflicts of Interest Register and associated documentation.
Records will include:

- Nature of the conflict.
- Date declared.
- Individuals involved.
- Risk assessment.
- Mitigation measures implemented.
- Date reviewed.

Records will be retained until the deadline for reviews of marking has passed, or until any appeal, malpractice investigation or other results enquiry has been completed, whichever is later.