Conflicts of Interest Policy

Dibden Park School

Document control	Details
Accountable role	Headteacher – Head of Centre (Naomi Carter)
Operational lead	Deputy Head Teacher (Sarah Drummond) & Examinations Officer (Laura Bortkiewicz)
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Our vision

Dibden Park School supports every child and young person to feel safe, be heard, discover their worth, develop their strengths and create a limitless future.



Respect | Engage | Belong | Independence | Ambition

Learn Now, Succeed Together, Grow Forever

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1. Purpose and scope

This policy explains how Dibden Park School identifies, declares and manages actual, potential or perceived conflicts of interest. It protects the integrity and fairness of qualifications, examinations and assessments delivered through the school and supports impartial decision-making in other school business.

The policy applies to all school staff, governors or trustees where applicable, volunteers, contractors and anyone acting for the school in an examination or assessment role. It covers conflicts involving a personal, family, financial, professional or other interest that could influence, or reasonably appear to influence, a person's judgement or actions.

This policy must be read alongside the current JCQ regulations and awarding organisation requirements. Where a qualification-specific rule sets a stricter requirement or deadline, that requirement takes precedence.

2. Meaning and principles

A conflict of interest exists when a person's private interest, relationship, outside role or personal benefit could affect their impartiality, or could reasonably be seen to affect it. A conflict may be actual, potential or perceived. A conflict does not automatically mean that anyone has acted improperly; it must be disclosed so that the school can assess and manage the risk.

- Conflicts must be disclosed promptly, before the person takes part in the affected decision, teaching, assessment or administration.
- The school will manage conflicts fairly and proportionately, with the integrity of the qualification or decision as the priority.
- A person must not decide for themselves whether a declared conflict is harmless. The Headteacher or designated independent decisionmaker determines the appropriate controls.
- Declaring a conflict will not, by itself, result in disadvantage or disciplinary action. Deliberately failing to disclose a relevant conflict may be treated as a breach of professional duties and, where applicable, reported under awarding organisation rules.
- Information about a declared conflict will be shared only with those who need it to assess and manage the risk, subject to legal and regulatory duties.

3. Roles and responsibilities

- The Headteacher, as Head of Centre, is accountable for ensuring that conflicts of interest are identified, managed, recorded and reported to awarding organisations where required. The Headteacher approves mitigation and ensures that the school has effective arrangements in place.
- The Examinations Officer maintains the central register, seeks declarations from relevant staff before each examination series, identifies awarding organisation deadlines, submits required notifications and retains evidence of actions taken.
- Subject leaders identify conflicts affecting teaching, assessment, speaking/listening/oracy components, marking and moderation. They propose appropriate safeguards and tell the Examinations Officer and Headteacher promptly.
- All staff and other people covered by this policy must declare relevant interests, relationships and outside roles; update their declaration if circumstances change; and follow the agreed controls.
- Where a declaration concerns the Headteacher or the person who would normally decide how to manage it, the matter is referred to the proprietor or another independent person designated to oversee the Head of Centre's responsibilities.

4. Identifying and declaring conflicts

Staff must consider whether a conflict could arise from a relationship, role or interest before undertaking the relevant activity. Examples include:

- a member of staff teaching or preparing a family member, close friend or their immediate family for a qualification with an internally assessed component, including an internally or externally assessed Speaking, Listening or Oracy component;
- a member of staff assessing, marking, authenticating, internally standardising or reviewing the work of a candidate with whom they have a close personal relationship;
- a member of staff or a member of the exams office team having a family member or close friend entered for an examination or assessment at Dibden Park School or another centre;
- a member of staff taking a qualification at this centre or another centre, whether or not it includes an internally assessed component;

- a staff member's role for an awarding organisation, supplier or other organisation that overlaps with their school responsibilities or could give access to confidential assessment information;
- a personal or financial interest, gift, hospitality, outside employment or relationship that could affect a school decision, such as recruitment, procurement, commissioning, student placement, awarding responsibilities or the allocation of resources.

Before each examination series, the Examinations Officer will remind relevant staff to declare any new or continuing conflicts. A declaration must be made as soon as the person becomes aware of the conflict and before they take part in the affected activity. A nil return may be requested for the central record. Staff must update the declaration if the relationship, role, qualification or assessment arrangements change.

Declarations are made to the Examinations Officer or Headteacher using Appendix A or the school's approved secure form. If the declaration concerns either of those people, it must be made to the independent person identified in section 3.

5. Conflicts in examinations and assessment

The Headteacher and Examinations Officer will apply the current JCQ General Regulations for Approved Centres and each awarding organisation's requirements. For each examination series, the school will:

- inform the relevant awarding organisation, before the published deadline for entries, when a member of staff is entered at this centre for a qualification that includes internally assessed components or units;
- inform the relevant awarding organisation, before the published deadline for entries, when a member of staff teaches or prepares a family member or close friend and their immediate family for a qualification with an internally assessed component. This also applies to staff conducting internally or externally assessed Speaking, Listening or Oracy components or units;
- declare a possible conflict to the awarding organisation before the published deadline for entries where a member of staff assesses a candidate with whom they have a close personal relationship. The candidate's work will be submitted for moderation whether or not it is selected in the moderation sample;
- maintain records of exams office staff whose family members or close friends are entered at this or another centre, staff taking qualifications at their own centre without internally assessed components, and staff taking qualifications at other centres.

The school will make every effort to avoid having a candidate assessed by a person with whom they have a close personal relationship. Where possible, the candidate will be taught, assessed, marked or reviewed by a suitably qualified person who has no such relationship. Other safeguards may include a second independent assessor, external moderation, independent authentication, a documented standardisation check, restricted access to confidential materials, or separating entry and results administration from the staff member concerned.

A member of staff taking a qualification at their own centre should be entered there only as a last resort if they cannot find another centre. If this is unavoidable, the Headteacher will ensure the staff member has no access to examination materials before the examination, receives no preferential treatment and is treated in the same way as any other candidate. Other staff will be briefed on maintaining the security and confidentiality of materials.

The Headteacher records the conflict, the awarding organisation notification and the safeguards put in place. The Examinations Officer checks that each safeguard is completed and retains evidence. If a conflict is identified after an awarding organisation deadline, the Headteacher or Examinations Officer will contact the awarding organisation immediately for instructions and record the advice received.

6. Conflicts in other school decisions

For decisions outside examinations and assessment, a person who has declared a conflict must not take part in the discussion, recommendation, selection, approval or vote unless the decisionmaker has expressly authorised limited involvement and recorded the reason. Depending on the situation, the person may be

asked to leave the meeting, not receive papers, or have the matter decided by another suitably independent person.

Gifts and hospitality must be declared and managed under the school's relevant financial and procurement arrangements. No person may use their school role, confidential information or influence to obtain a personal benefit for themselves, a family member or another connected person.

The school will document the conflict, the decision about participation, any information restrictions, the alternative decisionmaker and the reasons for the final decision. If a conflict also raises a safeguarding, whistleblowing, fraud or disciplinary concern, the relevant school procedure must also be followed.

7. Records, review and failure to disclose

The Headteacher ensures that the central register contains the person's name and role, the nature of the conflict, affected qualification or decision, date disclosed, risk assessment, mitigation, awarding organisation notification where required, person responsible for the safeguards and date for review. Records are stored securely and access is restricted.

For examination and assessment conflicts, records are retained until the deadline for reviews of marking has passed or until any appeal, malpractice investigation or other results enquiry is complete, whichever is later. Other records are retained in accordance with the school's data retention arrangements.

A senior leader reviews this policy annually and whenever JCQ or an awarding organisation changes its requirements. Staff are informed of the policy and reminded to disclose conflicts before relevant activities. Failure to disclose or comply with agreed safeguards may be addressed under the relevant staff or awarding organisation procedures.

Appendix A. Conflict of interest declaration

Complete this form when you have an actual, potential or perceived conflict, or submit a nil return if requested. Send it to the Examinations Officer and Headteacher. If your declaration concerns either of them, send it to the independent person designated by the proprietor.

Information	Declaration
Name and role	
Qualification, subject, component and series (if relevant)	
Candidate or decision affected (if known)	
Nature of the relationship, interest or outside role	
What part of the teaching, assessment or decision are you involved in?	
Suggested safeguards or restrictions	
Date declared and signature	
Decision, mitigation and person responsible for review	
Awarding organisation notified and date (if required)	

References

- JCQ, General Regulations for Approved Centres, effective 1 September 2026, especially paragraphs 5.3(j), 5.3(x), 5.7(g): https://www.jcq.org.uk/knowledge-hub/general-regulations-for-approved-centres/
- JCQ, Instructions for conducting non-examination assessments (GCE and GCSE specifications), effective 1 September 2026: https://www.jcq.org.uk/knowledge-hub/instructions-for-conducting-non-examination-assessments-gce-gcse-specifications/
- JCQ, Instructions for conducting coursework, effective 1 September 2026: https://www.jcq.org.uk/knowledge-hub/instructions-for-conducting-coursework/

Staff must check the latest regulations, awarding organisation guidance and published deadlines for each examination series.