

Guidance on managing conflicts of interest for schools and colleges



Introduction

This guidance gives an overview of the measures to manage a member of staff who has a conflict of interest. It should be read alongside the JCQ document [General Regulations for Approved Centres](#), which states that schools and colleges must tell the relevant exam board about:

1. Any members of staff who are taking qualifications at their own centre **which include internally assessed components/units** (remember that other centres should be approached first - entering staff at the centre at which they work should be seen as a last resort)
2. Any members of staff who are teaching and preparing members of their own family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (eg son/daughter) for qualifications **which include internally assessed components/units**.

The regulations state that centres must keep clear records of all instances where:

3. 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 (eg son/daughter) being entered for examinations and assessments either at the centre itself or other centres;
4. Centre staff are taking qualifications at their centre which do not include internally assessed components units;
5. Centre staff are taking qualifications at other centres.

It's the responsibility of the Head of Centre to ensure that all conflicts of interest are reported and managed effectively to protect the integrity of the exams and assessments concerned.

Where **internally assessed components/units** are involved, any conflicts **must** be reported to AQA using the [Conflict of Interest webform](#).

A list of the qualifications which include internally assessed components can be found in **appendix A**.

Submitting a Conflict of Interest webform

Once the webform has been completed and submitted, we will **only contact centres if we need any further information, or if there are any concerns with the action the centre is taking to manage the conflict of interest.**

Remember that you **do not** need to tell us about any conflicts involving subjects which **do not have an internally assessed component or unit**, but the Head of Centre **must** manage these conflicts and have records readily available for inspection, for example should a visiting JCQ inspector request to see them.

If a conflict comes to light that cannot be managed by the examples below, then you must contact our the Exams Integrity team by emailing COIcentredeclarations@aqa.org.uk to ask for advice.



Guidance for centres on managing conflicts of interest

Please see below scenarios when handling potential conflicts of interests;

Conflict: Staff member taking a subject with an internally assessed component/unit at their own centre	Report to AQA using online form?	Yes
<p>As set out in the JCQ regulations, this is a 'last resort' scenario - ideally the centre should make arrangements for the member of staff to take the qualification elsewhere. The centre is required to show that attempts have been made to enter the staff member elsewhere when completing the online conflict of interests webform.</p> <p>If the centre is part of a multi-academy trust, the staff member could be entered at a different trust centre, if the entering centre does the required monitoring/supervision.</p> <p>If it's not been possible to enter the member of staff elsewhere, then strategies to manage this conflict include the following:</p> <ul style="list-style-type: none"> • Arrangements should be made to make sure that the member of staff is not treated any differently to any other student. • Access to Centre Services should be restricted if the internally assessed component has any pre-release material to make sure the staff member cannot access any confidential materials in advance. • If the member of staff is a member of the exams team, then any access to secure storage should be restricted for them while they are taking exams. • The Head of Department/member of the Senior Leadership Team must consider monitoring completing and marking the internally assessed component, as an additional check to make sure that the member of staff has been assessed fairly- this can be as part of an ongoing process of checks or as part of internal standardisation prior to submission of the marks/ outcome to AQA. 		
<p>Remember that this conflict does not need reporting to AQA if the subject does not have an internally assessed component/unit. However, the Head of Centre will need to put in place conflict management arrangements and have records available for inspection. The above strategies would also be suitable for this.</p>		

<p>Conflict: Member of staff who is teaching/preparing members of their own family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (eg son/daughter) for qualifications which include an internally assessed component/unit</p>	<p>Report to AQA using online form?</p>	<p>Yes</p>
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It's important to make sure that the member of staff and the centre can be protected from allegations of malpractice. Ideally, the relative should be allocated to a different teacher in the department, as this will negate the conflict.

However, if this is not possible, ways to manage this conflict include:

- Access to Centre Services should be restricted if the internally assessed component has any pre-release material to make sure the staff member cannot access any confidential materials in advance of the release date - access can be supervised by another member of staff.
- If the member of staff is also a member of the exams team, then any access to secure storage should be restricted during exams
- The Head of Department/member of the Senior Leadership Team must consider monitoring the completing the marking of the internally assessed component, as an additional check to make sure that the member of staff's relative has been assessed fairly. This can be as part of an ongoing process of checks or as part of internal standardisation the marks/outcome are submitted to AQA.

Remember that this conflict does not need reporting to AQA if the subject does not have an internally assessed component/unit. However, the Head of Centre will need to put in place conflict management arrangements and have records available for inspection. The above strategies would also be suitable for this.



Conflict: Exams office staff member has a member of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (eg son/daughter) being entered for an exam or assessment either at the centre itself or at another centre (i.e. subject without internally-assessed component)	Report to AQA using online form?	No
<p>The JCQ regulations state that it's important that the centre keeps a record detailing the measures in place to mitigate the risks. It's strongly recommended that the record should be signed by the member of staff and the Head of Centre. If one of the requirements is for the conflict to be monitored, then the person instructed to do the monitoring should also sign the record. Remember that the record may be inspected by a JCQ Centre Inspector as part of a routine visit and may be requested if concerns are reported to an exam board. The records must be kept until the deadlines for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed (whichever is later). Keeping these records and putting the agreed mitigation measures in place will protect both the school and the member of staff should any allegations be made against them.</p> <p>In the event of a conflict of this nature, we recommend that the following measures would be appropriate:</p> <ul style="list-style-type: none"> • The exams officer/member of the exams office staff should not enter the exam store room without direct supervision • The exams officer/administrator should not handle/ have any access to live papers that their relative/close family friend is taking. This includes before, during and after the exam and completed candidate scripts. Another member of the exams team should assist with/ complete the packaging of the completed papers to return to AQA • Where possible a second exams officer/administrator should download secure materials from Centre Services. If this is not possible, the exams officer/administrator must be supervised during the window of downloading electronic materials on the day of exam • The exams officer/ administrator should not have access to the student's results on EDI day or on results day, so that they do not see the results before the student • The member of staff should avoid contact with the student before the exams, in line with the timed guidelines available to access papers. • If the centre operates with a sole Exams Officer, a robust contingency plan must be put in place before the exam series in question, to ensure there is another member of staff who is trained and able to carry out the Exams Officer responsibilities. In these instances, centres should seek additional support and guidance from the Exams Integrity team. 		

*NB: also relevant for managing conflict where there is not an internally assessed component.

Appendix A:

List of A-level and GCSE subjects with internally-assessed components

GCSE

Spec Code	Subject	Component(s)
8201-8206	Art and Design	8201/C, 8202/C, 8203/C, 8204/C, 8205/C, 8206/C
8236	Dance	8236/C
8552	Design and Technology	8552/CE
8261	Drama	8261/C, 8261/X
8852	Engineering	8852/C
8700	English Language	8700/C
8585	Food Preparation and Nutrition	8585/C
8572	Media Studies	8572/C
8271	Music	8271/P, 8271/C
8582	Physical Education	8582/C

ELC

Spec Code	Subject	Component(s)
5970	Step up to English (Silver Step)	5972/1, 5972/2
5970	Step up to English (Gold Step)	5973/1, 5973/2
5930	Mathematics	5930
5960	Science	5961, 5962

FCSE

Spec Code	Subject	Component(s)
8971/2/3	Chinese (Mandarin)	8971, 8972, 8973
8956/7/8	French	8956, 8957, 8958
8966/7/8	German	8966, 8967, 8968
8996/7/8	Spanish	8996, 8997, 8998

Level 1/2 Project

Spec Code	Subject	Component(s)
7991	Level 1 Foundation Project	7991
7992	Level 2 Higher project	7992

AS/A-level

Spec Code	Subject	Component(s)
7201-7206	Art (A-level)	7201, 7202, 7203, 7204, 7205, 7206
7402	Biology (A-level)	7402/C
7405	Chemistry (A-level)	7405/C
7517	Computer Science	7517/C
7237	Dance	7237/X (A-level)
7562	D&T Fashion and Textiles	7562/C (A-level)
7552	D&T Product Design	7552/C (A-level)
7262	Drama and Theatre	7262 (A-level)
7702	English Language	7702/C
7707	English Language and Literature	7707/C
7712	English Literature A	7712/C
7717	English Literature B	7717/C
7037	Geography	7037/C
7042	History	7042/C
7572	Media Studies (A-level)	7572/C
7272	Music (A-level)	7272/P, 7272/C
7582	Physical Education (A-level)	7582/C
7408	Physics (A-level)	7408/C

Extended Project/Certificate and Extended Certificate

Spec Code	Subject	Component(s)
7993	Level 3 Extended Project	7993
1830	Certificate in Applied Business	ABS2, ABS5, ABS6, ABS7, ABS8
1775	Certificate in Applied Science	ASC2, ASC5, ASC6A, ASC6B, ASC6C



