



Conflict of Interest in Assessment & Internal Quality Assurance Policy

Ysgol Penrhyn Dewi VA – Conflict of Interest in Assessment & Internal Quality Assurance Policy

Owner: Assistant Headteacher (Teaching, Learning & Standards)
Approved by: Senior Leadership Team / Governing Body

Version: 1.0

Effective from: [Insert Date]

Review Cycle: Annual (or after regulatory changes)

1. Purpose

Ysgol Penrhyn Dewi is committed to ensuring that all assessment and internal quality assurance (IQA) processes—including GCSE, WJEC vocational qualifications, internal examinations, and centre-assessed components—are conducted fairly, consistently, and free from undue influence.

This policy outlines how the school identifies, manages, and records **actual, potential, and perceived conflicts of interest** to protect the integrity of learner outcomes.

2. Scope

This policy applies to:

- All **teaching staff** involved in delivery, assessment, or marking of GCSE/WJEC qualifications.
- All staff involved in **IQA**, standardisation, appeals, and results sign-off.
- Supply teachers, peripatetic staff, and external assessors.
- Any staff member with relationships that may affect assessment decisions (family, personal, or financial).
- All assessments undertaken in or on behalf of the school (KS3, GCSE, vocational units, endorsements, NEAs).

3. Definitions

Conflict of Interest

Any circumstance where professional judgment regarding the assessment or moderation of learners may be **influenced by personal interest** or where it could reasonably appear that this is the case.

Conflicts may be:

- **Actual:** A current conflict exists.
- **Potential:** Could arise in future.
- **Perceived:** A reasonable person could assume a conflict.

4. Examples Relevant to Ysgol Penrhyn Dewi

- A teacher is responsible for assessing a **family member**, including step-children and close relatives.
- A member of staff tutors a learner **privately** outside of school.
- A teacher marks or verifies work of a learner with whom they have a **close friendship or dispute**.
- A staff member is both the **assessor and IQA** for the same GCSE/WJEC component.
- A staff member sits on an **appeals panel** for a learner whose work they assessed.
- Staff involved in a **malpractice investigation** also taking part in marking or moderation for the same cohort.
- Invigilation or access arrangement staff have a close relationship to a candidate



5. Responsibilities

Head of School / Executive Headteacher

- Ensures compliance with awarding-body regulations (e.g., WJEC/Qualifications Wales).
- Approves high-risk conflict mitigation.
- Have sight of and sign off Conflict of Interest Register annually

Exams Officer

- Maintains the **Conflict of Interest Register**.
- Communicates conflicts to WJEC or the JCQ Centre Inspection Service when required.

Quality & Standards Lead / Subject Leaders

- Ensure staff awareness and adherence to policy.
- Plan assessment duties to avoid conflicts where possible.

Teachers / Assessors / IQA Staff

- Declare conflicts immediately.
- Comply with mitigation measures.

6. Declaration Process

Conflicts must be declared:

- At the **start of the academic year**.
- When **teaching groups, timetables**, or **IQA roles** change.
- **Immediately** when a new conflict arises.

Staff must complete a **Conflict of Interest Declaration Form** (Appendix A) and submit it to the Exams Officer, who logs it in the **school's COI Register**.

Failure to declare a conflict may result in disciplinary action and must be reported to the awarding body if it compromises assessment integrity.

7. Managing & Mitigating Conflicts

Depending on the nature of the conflict, mitigation actions may include:

Low–Moderate Risk

- Hall invigilators may have relation sitting in hall
- Teacher marking NEA of a close relative

Mitigation may include:

- Exams assist to be used to identify and flag any conflicts. Will alert Exams Officer who can ensure no relatives of pupils are invigilating in same room.
- Work marked by a **different teacher**.
- **Second-marking** or blind marking.
- Independent **IQA sample** of the affected learners.
- Exclusion from internal moderation or standardisation for that group.

High Risk (requires Head of School approval)

- A teacher assessing a close family member. E.g. performance element of GCSE
- Private tutoring of any learner assessed within the school.
- Staff involved in appeals relating to their own assessment decisions.

Mitigation may include:

- Full **recusal** from assessment for the affected learners.
- Entire reassignment of assessment duties.
- External IQA or independent review where required by WJEC.



8. Recording & Documentation

The following must be documented:

- Full **COI Register** maintained by Exams Officer.
- Mitigation actions on **departmental assessment plans**.
- Notes within the **IQA sampling strategy** (especially for WJEC vocational qualifications).
- Evidence of second marking/independent sampling.

Documents will be securely stored for a minimum of **three years** or longer if required by WJEC or JCQ.

9. Monitoring & Review

- COI Register reviewed **termly** by SLT.
- Annual audit of assessment procedures by the Quality & Standards Lead.
- Policy reviewed **annually** by SLT and approved by Governors.

10. Reporting Concerns

Staff or learners may raise concerns of an undeclared conflict through:

- The **Exams Officer**,
- The **Head of School**, or
- The school's **Whistleblowing Policy**.

Concerns will be handled confidentially and investigated promptly.

11. Training

- New staff: COI induction during onboarding.
- Annual update for all teaching and assessing staff.
- Additional briefing prior to GCSE/WJEC Non-Examined Assessment (NEA) deadlines.



Appendix A — Ysgol Penrhyn Dewi Conflict of Interest Declaration Form

1 Name: _____

2 Role/Department: _____

3 Date: _____

4 Type of declaration (tick):

☐ Annual declaration

☐ New staff

☐ Change in circumstances

5 Describe the conflict (include learner names, qualification, and nature of relationship):

6 Assessment/IQA areas affected:

7 Your suggested mitigation (if any):

8 I confirm this is a full and accurate declaration.

Signature: _____ Date: _____

For School Use:

Risk Level: Low / Moderate / High

Mitigation Approved:

Approved by: _____ (Exams Officer / Head of School)

Date: _____

Logged in COI Register: Yes / No