Reference Number: R01

ACADEMIC CONFLICT OF INTEREST PROCEDURE

Policy Review					
Author/Owner	**Position**	**Approved by:**	**Approval Date**	**Review Cycle Review Date**	**Published on Website Y/N**
Andrew Mitchell	Quality Manager	Signed SLT: Donna Short VP QofE	6 July 2026	Yearly June	Y

Document Control – Revision History (Policies only)

Author/Owner	Summary of Changes	Revision Date	Version
Derrick Goddard	Minor amendment to responsibility for guidance	03.04.17	
Derrick Goddard	No Changes required	12.06.18	
k Goddard	Minor amendments to the purpose and regulatory criteria and conditions	15.03.19	
Matt Hann	Minor amendments reflecting CMT structure and job title changes	03.06.19	
Susie Peart	Minor changes to wording, for clarity	14.01.21	
Susie Peart	Added in JCQ regulations for staff awareness	28.02.22	v1
Andrew Mitchell	Purpose rewritten, Retention of records included in line with JCQ requirements (does not appear in the retention of records policy), Table used to record COI included. Completion of front sheet, 23/24 JCQ General Regulations considered and link provided.	29.08.24	V1
Andrew Mitchell	Inclusion of additional section for reporting of a COI. 24/25 JCQ General Regulations considered and link provided. Addition of the Declaration of Interest Form	14-04-25	v2
Andrew Mitchell	Updated to align with EPAO Policy. Added EPA-specific conflict of interest requirements, Minor amendments to scope, definitions and reporting arrangements. Additional guidance included regarding EPA personnel, conflict mitigation, independence requirements and stakeholder reporting.	15-06-26	V3

Initial Equality Impact Screening
Has anyone else been consulted on this policy and/or procedure? Reviewed By VP Q/E
What evidence has been used for this impact screening (e.g. related policies, publications)? related policies

Declaration (please tick one statement and indicate any negative impacts)

x☐I am satisfied that an initial screening has been carried out on this Policy and/or Procedure and a full Equality Impact Assessment is not required. There are no specific negative impacts on any of the Protected Characteristics groups.

☐I recommend that an Equality Impact Assessment is required by the Equality and Diversity group, as possible negative impacts have been identified for one or more of the Protected Characteristics groups as follows:

- ☐ Age
- ☐ Disability
- ☐ Gender Reassignment
- ☐ Race
- ☐ Religion or belief
- ☐ Sex
- ☐ Sexual orientation
- ☐ Marriage & civil partnership
- ☐ Pregnancy & maternity

Completed by:	Donna Short	**Position:**	Vice Principal Quality of Education	**Date:**	22/10/24

Reviewed by Equality & Diversity Group: YES/NO If Yes: Date:

I confirm that any recommended amendments have been made

Summary of Comments including Recommendations from Equality & Diversity Group Review:

Amended by Author:		**Position:**		**Date:**	

Contents

1. PURPOSE OF THE PROCEDURE

1.1 All staff at Yeovil College will disclose any activity that might give rise to a potential conflict of interest. If there is any doubt whether it represents a conflict of interest it should be discussed with the relevant line manager. The individual and their line manager are equally responsible for ensuring that the issue is documented carefully, and all reasonable steps are taken to solve the conflict. Following consultation with the Curriculum Area Manager (CAM) or other line manager, the CAM must inform the Quality Manager who then makes an informed decision (eg - Consult with the Awarding Organisation on how to proceed or transfer the risk/conflict).

2. SCOPE

2.1 A conflict of interest is a situation in which an individual or organisation has competing interests, loyalties, responsibilities or relationships that may compromise, or appear to compromise, impartiality, objectivity, independence or professional judgement.

2.2 Conflicts of interest may arise through personal relationships, family connections, financial interests, employment arrangements, consultancy activities, previous involvement in assessment decisions, professional relationships, employer relationships, apprenticeship training arrangements, or any other circumstance that could influence decision-making.

2.3 This procedure applies to all employees, governors, contractors, associate staff, independent assessors, external examiners, invigilators, quality assurers and any other individuals involved in assessment, quality assurance, certification or regulatory activities undertaken on behalf of Yeovil College.

2.4 This procedure addresses the following regulatory criteria and conditions: JCQ - Conflicts of Interest and Declarations 2025/26/ General Regulations:

2.5 To comply with the regulations, the centre is required to manage conflicts of interest and inform the relevant awarding organisations (by the published deadline for entries for each examination series) of:

2.5.1 any members of centre staff who are taking qualifications at their own centre which include internally assessed components/units.

2.5.2 any members of centre staff who are teaching and preparing members of their family (which includes stepfamily, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications which include internally assessed components/units, **and**

And to maintain clear records of **all instances** where:

2.5.3 exams office staff have members of their family (which includes stepfamily, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) being entered for examinations and assessments either at the centre itself or other centres.

2.5.4 centre staff are taking qualifications at their centre which **do not** include internally assessed components/units.

2.5.6 centre staff are taking qualifications at other centres.

2.6 Additional examples of conflicts of interest include, but are not limited to:

2.6.1 Assessing, internally verifying, externally examining or quality assuring the work of a family member, close friend or individual with whom there is a personal relationship.

2.6.2 Having managerial responsibility for an apprentice, learner or candidate being assessed.

2.6.3 Being employed by, contracted to, or having a financial interest in an employer whose apprentice is being assessed.

2.6.4 Previous involvement in teaching, coaching, mentoring, assessment or support activities that could compromise the independence of an assessment decision.

2.6.5 Serving as an EPA Independent Assessor or EPA External Examiner where a personal, professional or commercial relationship exists with an apprentice, employer or training provider.

2.6.6 Any circumstance where a reasonable person could perceive that impartiality may be compromised.

3 RESPONSIBILITY AND AUTHORITY

3.1 Head of Centre Responsibility:

The head of centre must ensure that the records include details of the measures taken to mitigate any potential risk to the integrity of the qualifications affected. The records may be inspected by a JCQ Centre Inspector and/or awarding body staff. They might be requested in the event of concerns being reported to an awarding body. The records must be retained until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later.

3.2 Individual Responsibility:

a) Individuals within Yeovil College have responsibility for ensuring that they are familiar with the Conflict-of-Interest procedure and any associated documentation (AO policies).

b) All individuals will be required annually to read and understand the Conflict-of-Interest procedure.

c) The most important feature of the procedure is the requirement that an individual disclose any activity that might give rise to a potential conflict of interest. If there is any doubt about whether or not it represents a conflict of interest, the staff member should report it.

d) Individuals undertaking independent assessment, external quality assurance, end-point assessment, moderation or examination activities must remain independent of the delivery, teaching, coaching, mentoring and internal quality assurance of the learners they assess.

e) Associate staff, contractors, EPA Independent Assessors and EPA External Examiners are required to comply with this procedure in the same manner as employed staff.

f) Prior to undertaking assessment activity, individuals may be required to formally declare that no actual, potential or perceived conflict of interest exists.

g) The Quality Manager is responsible for ensuring that the issue is documented carefully and in accordance with AO policy.

h) The Quality Manager holds a central record annually of any declared Conflicts of Interest.

i) For YCUC, minuting of declarations of interest is a standing agenda item at chaired HE exam boards, thus there is no requirement for these to be logged separately.

4. REPORTING A CONFLICT OF INTEREST

4.1 All staff members have a duty to report any actual, potential, or perceived conflicts of interest (COIs) as soon as they become aware of them. The following procedure must be followed to ensure consistent and transparent handling of COIs

4.2 The staff member must report the conflict of interest to their line manager at the earliest opportunity.

4.3 The line manager must notify the Quality Manager, who will be responsible for formally documenting the conflict. The Quality Manager will ensure the completion of the Declaration of Interest Form 2024/2025, recording all relevant details.

4.4 Once the COI form has been completed, the Quality Manager will inform the Exams Team to ensure appropriate action is taken to maintain the integrity of any affected assessments or processes.

4.4.1 **End Point Assessment (EPA) Activity**
Where individuals undertake End Point Assessment activities, additional measures shall be implemented to ensure independence.

4.4.2 EPA Independent Assessors and EPA External Examiners must declare any actual, potential or perceived conflicts of interest prior to appointment and prior to each assessment cycle.

4.4.3 Learner and employer information may be shared with appointed EPA personnel in advance of assessment activity solely for the purpose of identifying potential conflicts of interest.

4.4.4 Where a conflict is identified, the Quality Manager shall determine whether mitigation is sufficient or whether an alternative assessor or examiner must be appointed.

4.5 Where necessary, and in accordance with regulatory requirements, the Exams Team will notify the relevant awarding organisation of the reported conflict, following their established procedures for such disclosures.

4.6 **Assessment and Management of Conflicts of Interest**

4.6.1 Upon notification of a conflict of interest, the Quality Manager shall review the nature and significance of the conflict.

4.6.2 Appropriate mitigation measures shall be agreed and documented. These may include:

- Reallocation of assessment duties.
- Additional quality assurance activity.
- Independent moderation.
- Restriction of access to assessment materials or learner records.
- Notification to awarding organisations, universities or regulatory bodies.
- Withdrawal of the individual from involvement in the activity.

4.6.3 All mitigation actions must be recorded alongside the declared conflict and reviewed periodically to ensure their effectiveness.

4.7 At the start of each academic year, staff who declared a conflict of interest during the previous year will be sent a copy of their previously completed Declaration of Interest form. They will be asked to review the information and confirm whether it needs to be amended, remains current, or should be removed. This ensures all records remain accurate and up to date.

4.8 Records of COIs and the actions taken must be retained securely and made available for audit or regulatory review where required. The records must be retained until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later

5. RELATED POLICIES, PROCEDURES, DOCUMENTS, DEFINITIONS

5.1 Any required guidance or interpretation on potential conflicts of interest (Awarding Organisation, qualification, assessment, IQA etc) should be sought from the college's Quality Manager.

5.2 The following table is designed to capture names of members of staff who have identified themselves to their Curriculum Area Manager and the nature of the conflict of interest. The Curriculum Area Manager and Quality Manager will then formulate mitigation and implement the actions arising.

Name of member of staff	Nature of conflict of interest Linked Col Form	Mitigation and actions where appropriate	AO/ University/ EPAO Informed	Are there any internally assessed units? Y/N	Name of Awarding Organisation
Teacher A	teaches their own Nephew for Btec qual (include program name and include learner name)	All internally assessed units marked/moderated by teacher B. Ensure flagged in Assessment Plan.	N	Y	Pearson
Member of staff B	taking a IQA qualification with us as an adult evening student	Removed access from Walled Garden and COI declared to C&G.	Y	Y	City and Guilds

5.3 **Additional Related Documents**

- End Point Assessment Organisation (EPAO) Policy, Procedure and Regulations
- EPA External Examiner Conflict of Interest Declaration Form

- Internal Quality Assurance (IQA) Procedure
- Malpractice and Maladministration Policy and Procedure