

Conflict of Interest Policy

Examinations Centre

Centre	Excel Tutors (Centre 10488)
Address	161-163 Commercial Road, London, E1 2DA
Policy owner	Head of Centre
Operational lead	Exams Officer
Last reviewed	July 2026
Review cycle	Annually, on publication of updated JCQ regulations and guidance

This policy is aligned with:

- JCQ General Regulations for Approved Centres 2025-2026
- Ofqual Conditions of Recognition (A4, A8)

Reviewed annually on the publication of updated JCQ regulations and guidance (General Regulations for Approved Centres, Instructions for Conducting Examinations, and related documents).

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1. Purpose

The purpose of this policy is to ensure that all actual, potential, or perceived conflicts of interest (COIs) involving the administration, assessment, or delivery of examinations at Excel Tutors are identified, declared, and managed effectively to maintain the integrity, fairness, and credibility of the centre's examination processes.

This policy applies to all examinations conducted at Excel Tutors, including GCSE, A Level, iGCSE, International A Level, and Functional Skills, for both internal and private candidates.

2. Regulatory Context

This policy is written in accordance with the following regulatory frameworks:

- JCQ General Regulations for Approved Centres (GR, 2025-2026)
- Ofqual Conditions of Recognition (A4 and A8)
- CCEA General Regulations and guidance for exam centres

- Data Protection Act 2018 and UK GDPR
- Excel Tutors internal policies (Safeguarding, Malpractice, Data Protection, and Staff Code of Conduct)

3. Definition of a Conflict of Interest

A conflict of interest arises where an individual's personal, financial, or professional interests, or those of a close family member, could compromise, or appear to compromise, the integrity, objectivity, or impartiality of examination-related decisions or actions.

Conflicts of interest may be:

- Actual, The conflict exists now.
- Potential, The conflict may arise in the future.
- Perceived, A reasonable observer might think a conflict exists, even if it does not.

4. Examples of Conflicts of Interest

Examples relevant to an examinations centre include:

- A member of staff or invigilator supervising or assessing a relative, close friend, or private tuition student.
- An Exams Officer with access to confidential materials who privately tutors a candidate entered at the centre.
- A tutor preparing private candidates for exams hosted at the centre.
- Staff members who have a financial interest in external tuition or exam services linked to the centre.
- Assessors or internal verifiers marking or moderating work of candidates with whom they have a personal connection.
- Individuals involved in candidate registration, seating, or invigilation who have a relationship with a candidate.
- Use of Artificial Intelligence (AI) tools in candidate preparation or assessment that could bias decisions or authenticity.
- Ownership or partnership links between the centre and a private tutoring agency that supplies candidates.

5. Principles

Excel Tutors upholds the following principles to manage conflicts of interest:

- Transparency, All actual, potential, and perceived conflicts must be disclosed.
- Fairness, Decisions must be free from bias or undue influence.
- Accountability, The Head of Centre holds overall responsibility for managing and recording conflicts.
- Confidentiality, Declarations and mitigation measures are handled discreetly and securely.

6. Responsibilities

- Head of Centre: Overall accountability for COI management, approval of mitigation actions, and reporting to awarding organisations.
- Exams Officer: Maintains the Conflict of Interest Register, collects staff declarations, and implements mitigations.
- Teaching and Invigilation Staff: Must disclose any personal or professional interests that could affect impartiality.
- Assessors and IQAs: Must not assess work where a conflict exists; alternative marking must be arranged.
- Contractors, Private Tutors, and Volunteers: Must complete a COI declaration form before involvement in exam activities.

7. Identification and Declaration Process

1. All relevant personnel are required to complete a Conflict of Interest Declaration upon appointment, annually, and whenever circumstances change.
2. Declarations must be submitted to the Exams Officer, who records them in the COI Register.
3. The Head of Centre reviews all declarations, determines risk level, and implements mitigation measures.
4. High-risk conflicts are reported to the relevant awarding organisations (JCQ, CCEA, or equivalent) in accordance with their timelines.
5. Staff who fail to disclose a conflict may be subject to disciplinary action under the centre's procedures.

8. Mitigation Strategies

Mitigation actions may include:

- Reassigning invigilation or assessment duties to a different staff member.
- Independent verification or second marking of candidate work.
- Physical separation of candidates from related staff members during exams.
- Restricting access to secure materials for staff with a declared conflict.
- Oversight by an independent staff member during marking, invigilation, or moderation.
- Declaration to awarding bodies if unavoidable conflicts exist (e.g., sole subject specialist).

9. Record Keeping and Reporting

A secure Conflict of Interest Register will be maintained by the Exams Officer and stored in the secure exams drive. The register includes:

- Name and role of the individual
- Nature and description of the conflict
- Date identified and mitigation actions taken
- Status (resolved/unresolved)
- Whether reported to the awarding organisation

The Head of Centre reviews the register at least once per term, and updates are shared with the centre's governance or compliance lead.

10. Use of Artificial Intelligence (AI)

Excel Tutors recognises that AI technologies may create new types of conflicts of interest. Staff and candidates must ensure that AI tools are used ethically and transparently, and that their use does not compromise academic integrity. Any use of AI in candidate preparation, assessment, or marking must be declared and authorised by the Head of Centre.

11. Breaches and Sanctions

Failure to declare or appropriately manage a conflict of interest may result in:

- Disciplinary action (for staff)
- Notification to awarding organisations and potential sanctions
- Invalidated assessments or disqualification (for candidates)
- Reporting to Ofqual or regulatory bodies for serious or repeated breaches

12. Review and Communication

This policy will be reviewed annually or following any regulatory or structural change affecting the exams centre. It will be disseminated to all exams staff, tutors, and contractors during induction and training. Updated versions will be stored on the secure exams portal and shared with awarding organisations upon request.