

NCTJ Conflicts of Interest table

Table 1: Potential conflict of interest scenarios

Potential conflict of interest	Responsibility, discussion and reasonable steps to ensure no adverse effects and/or effects mitigated as far as possible	Identified by	Responsible board or committee	Review date and process	Actions taken
Some journalism exam board members may deliver refresher training for the NQJ and may be involved in the setting, checking and sign off of the NQJ exam papers.	All NCTJ examiners are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest. All NCTJ examiners have signed an examiner agreement with a confidentiality clause in it. All examiners have read the conflicts of interest policy. Such a practice, where it is found or suspected, may be treated as malpractice and dealt with through NCTJ's Malpractice and Maladministration Policy.	Head of awarding and chief executive	Journalism exam board	Journalism board meets 3 times a year to approve exam papers for NQJ. Agendas and minutes	NCTJ and examiners attend exam board meetings. Potential conflicts/risks identified and monitored
Some NCTJ tutors may be members of the Diploma in Journalism subject exam boards and involved in the setting, checking and sign off of the diploma exam papers	All NCTJ exam board members and exam setters are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest. All NCTJ exam board members have signed an examiner agreement with a confidentiality clause in it. From September 2018, all tutor exam setters will sign an annual declaration requiring them to comply with their obligations to protect the confidentiality of assessment materials. Exam setting/checking process has controls built in to ensure that (as far as possible) tutor exam setters do not know when their papers are being used. All setters have read the conflicts of interest policy. Such a practice, where it is found or suspected, may be treated as malpractice and dealt with through NCTJ's Malpractice and Maladministration Policy.	Head of awarding, chief executive and subject board chairs	Exam subject boards	Exam boards meet twice a year which includes discussions on COIs and exam setting process. Agendas and minutes. Ongoing review by Head of Q&A and self-evaluation	NCTJ and examiners attend exam board meetings. Potential conflicts/risks identified and monitored
Members of the main board, senior management team, Journalism	All staff and members in attendance at NCTJ meetings will be required to declare, at the	Chief executive,	All boards and	Annual self-assessment	Ongoing agenda item negates potential

NCTJ Conflicts of Interest table

Potential conflict of interest	Responsibility, discussion and reasonable steps to ensure no adverse effects and/or effects mitigated as far as possible	Identified by	Responsible board or committee	Review date and process	Actions taken
<p>Qualifications Board, subject exam boards or Accreditation Review board may unduly influence decisions so as to ensure a personal or commercial material benefit (e.g. in relation to interests they may have which are external to NCTJ).</p>	<p>beginning of a meeting, any private interest which s/he has in an item on the agenda to be discussed, and certainly before any discussion of the item. This 'declaration of possible conflicts of interest' is a standard item on all agendas. Any staff COIs are logged in Creatio. In doing so they will then abstain from any vote/decision that may pose a conflict of interest to the member – especially where they may directly or indirectly receive a material benefit from the decision and/or has a conflict in loyalties (e.g. their overriding duty is to act in the best interests of the other party). They may be allowed to engage in the discussion if the others members do not object and/or they possible conflict is already known to the rest of the members/attendees. All decisions under a conflict of interest will be reported in the minutes of the meeting with details of:</p> <ul style="list-style-type: none"> • the nature and extent of the conflict; • an outline of the discussion; • the actions taken to manage the conflict. 	<p>head of qualifications, head of awarding, quality and standards manager</p>	<p>committees</p>	<p>checks, agendas and minutes.</p>	<p>risks.</p>
<p>Staff may have a conflict of interest that impacts on their ability to carry out their role appropriately, consistently and with integrity.</p>	<p>All NCTJ staff are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest. In relation to handling/investigating potential malpractice or maladministration cases by learners or centre-based staff, the quality and assessment manager is aware of the need to identify and manage any potential conflicts of interest.</p> <p>Any staff COIs are logged in Creatio.</p> <p>Members of the main board declare any possible</p>	<p>Chief executive and Head of finance and IT</p>	<p>Management team and main board</p>	<p>Rolling review</p>	<p>No actions taken so far, potential situations regularly monitored.</p>

NCTJ Conflicts of Interest table

Potential conflict of interest	Responsibility, discussion and reasonable steps to ensure no adverse effects and/or effects mitigated as far as possible	Identified by	Responsible board or committee	Review date and process	Actions taken
	conflicts they have in the Register of Interests and update this should their circumstances change by completing and submitting a new Declaration of interest form to the chief executive. The head of finance and IT is responsible for maintaining the Register of Interests				
Quality assurance staff (e.g. examiners) involved in the design of assessments may not objectively highlight issues with the assessment when they carry out their quality assurance role (e.g. they may be less likely to identify adverse issues with the assessments).	<p>All staff at NCTJ are committed to carrying out their role to the best of their ability and are aware of the need to identify and manage any potential conflicts of interest. Any staff COIs are logged in Creatio.</p> <p>The work of all examiners is subject to review by exam boards and the head of quality and assessment to ensure that they have carried out their role effectively and consistently as they would with qualifications/assessments which they have had no involvement with in their design. Examiners all sign a service level agreement which included a clause the examiners must declare any current or potential conflicts of interest and confirm they have read the NCTJ's conflicts of interest policy as published on the NCTJ website. In particular, the head of awarding will consider, as part of our ongoing standardisation and review arrangements, the nature of the findings/reports/activities of such individuals to ensure they have acted consistently and appropriately.</p>	Head of awarding and subject board chairs	Management team and subject exam boards	Annual review as part of self-assessment	No issues identified
<p>Allocating spot checkers to centres that may have a conflict of interest such as:</p> <ul style="list-style-type: none"> has worked for the centre, has worked for a competitor centre, has a family member 	<p>When centres are allocated by the head of awarding, they will ensure a spot checker is not allocated to a centre at which they have had or have declared a personal interest. Where this cannot be avoided, the head of awarding will scrutinise the work of the spot checker at the centre to ensure no conflicts have</p>	Head of awarding and accreditation manager	Accreditation board	Ongoing – reviewed by QA and standards committee and self-evaluation monitoring	No issues identified. Conflicts of interest policy published on website and discussed with spot checkers

NCTJ Conflicts of Interest table

Potential conflict of interest	Responsibility, discussion and reasonable steps to ensure no adverse effects and/or effects mitigated as far as possible	Identified by	Responsible board or committee	Review date and process	Actions taken
<ul style="list-style-type: none"> • working at the centre, • has a financial stake or shares in the centre • is a governor at the centre. 	occurred.				
Ensuring centre-based assessments are not undertaken by any person who has a personal interest in the result of the assessment (e.g. someone assessing the work of a family member; or someone whose pay is influenced by positive assessment results).	NCTJ will issue guidance to centres on how to manage and prevent conflicts of interest from occurring in assessment undertaken at the centre and which will state that centres are not permitted to offer financial reward for any of its staff involved in the assessment of learners in respect of the assessment outcomes of those learners (other than normal pay associated with the role of assessors, etc) that may lead to doubts about the integrity of their decisions. Such a practice, where it is found or suspected, may be treated as malpractice and dealt with through NCTJ's Malpractice and Maladministration Policy.	Head of awarding and quality and standards manager	Accreditation board	Ongoing	Conflicts of interest policy and malpractice and maladministration policy and guidance for centres published on tutor resources. Re-issued annually in centre admin packs.
Ensuring NCTJ-marked assessments are not undertaken by any person who has a personal interest in the result of the assessment (e.g. someone assessing the work of a family member; or someone whose pay is influenced by positive assessment results).	NCTJ staff are proactive in the identification and management of conflicts of interest that may affect our effectiveness, level of regulatory compliance and/or reputation or that may lead to doubts about the integrity of external examiners' decisions. Robust moderation procedures are followed and external examiners sign a service level agreement agreeing to declare any potential conflict of interest when assessing NCTJ exams. Such a practice, where it is found or suspected, may be treated as malpractice and dealt with through NCTJ's Malpractice and Maladministration Policy.	Head of awarding	Subject exam boards	Ongoing	Conflicts of interest policy issued to external examiners and malpractice and maladministration policy published on NCTJ website.
Ensuring that all contracted staff (e.g. consultants and suppliers) sign appropriate service agreements/contracts that include relevant clauses that govern	All external parties recruited for specific activities will be required to sign an appropriate service level agreement along with a non-disclosure agreement. With the normal process being to invite them to respond to a tender/work specification, shortlisted	Chief Executive and Head of Finance and IT	Main board	Annual review with self-evaluation processes.	SLA's distributed and signed, returned docs being logged by JA.

NCTJ Conflicts of Interest table

Potential conflict of interest	Responsibility, discussion and reasonable steps to ensure no adverse effects and/or effects mitigated as far as possible	Identified by	Responsible board or committee	Review date and process	Actions taken
confidentiality and ownership of information and prevents them from trading on the name of NCTJ or offering services or advice to learners or centres based on information they obtained whilst working at NCTJ.	and interviewed before a final selection is made based on the relevant experience, expertise and track record. They will be asked to declare any conflicts of interest in accordance with their duty of confidentiality and/or any other legal duty. Their work will be monitored by their line manager to ensure they operate effectively and in accordance with the expectations for the role they have been recruited for and to ensure that if they have an external role outside of their NCTJ activities they do not take any actions that are contrary to interests of NCTJ in the development, delivery or award of our qualifications.				
Ensuring staff do not receive undue gifts or hospitality that may affect their judgment or be considered by others as impacting their judgment.	Hospitality of any kind which might reasonably be seen to compromise an employee's personal judgment or integrity and be viewed as exerting influence to obtain preferential consideration should be refused. Staff must not allow themselves to be put in a position that might be deemed by others to have been influential in making a business decision as a consequence of accepting hospitality. Offers of one-off gifts should be politely but firmly declined. If they are pressed, the recipient should inform their line manager. Gifts or low intrinsic value such as calendars, diaries, flowers or chocolates need not be regarded as subject to this rule. In cases of doubt, the line manager should be consulted. Any staff COIs are logged in Creatio.	Senior management team	Main board	Reminder to staff annually	Ongoing added to employee handbook
Chief examiners may act as moderators when exams are set and marked. They also attend and	All chief examiners have signed and returned an examiner service-level agreement. There is always an NCTJ person at tutor marking workshops to	Chief executive, head of	Subject exam boards	Regular updates at staff meetings	NCTJ rep records confirmation of confidentiality of exam

NCTJ Conflicts of Interest table

Potential conflict of interest	Responsibility, discussion and reasonable steps to ensure no adverse effects and/or effects mitigated as far as possible	Identified by	Responsible board or committee	Review date and process	Actions taken
facilitate tutor marking workshops which may affect maintaining confidentiality of assessment materials at training events.	ensure confidentiality of exam materials is maintained. Exam scripts contain candidate numbers only so examiners cannot identify candidates that may be known to them when marking or moderating exams.	awarding, head of qualifications		on workshops and issues raised about marking or moderation, Workshop evaluations discussed at relevant subject exam boards	materials at each workshop held on booking spreadsheet.

Potential conflicts of interest log – a log of potential conflicts of interest is maintained in the Governance section of the NCTJ’s Creatio database.