

## **NCTJ Conflicts of Interest policy and procedures**

### **Contents**

1. Purpose .....	2
2. Scope .....	2
3. Definitions.....	2
4. Policy statements .....	3
4.1 Principles.....	3
4.2 Roles and responsibilities .....	4
5. Procedures .....	4
5.1 Declare the conflict.....	4
5.2 Resolve the conflict .....	4
5.3 Decision and actions .....	5
5.4 Recording and reporting.....	5
6. Regulatory references .....	6
7. Review arrangements.....	6
8. Contact us .....	7
9. Appendices.....	8

## 1. Purpose

The purpose of this policy is to:

- Identify and draw attention to conflicts of interest.
- Minimise or prevent conflicts from occurring.
- Manage conflicts effectively when they arise.

This ensures the NCTJ maintains the integrity of its qualifications, end-point assessments, and other awarding functions.

## 2. Scope

The policy applies to:

- NCTJ staff and representatives: All staff and representatives involved in the development, delivery, and support of NCTJ qualifications and services.
- Learners: Individuals undertaking NCTJ qualifications, units, or end-point assessments.
- Centres: Organisations approved to deliver NCTJ qualifications and end-point assessments.

If a conflict or potential conflict is identified, it must be reported to the chief executive, even if there is uncertainty about its significance.

## 3. Definitions

Learners: Encompasses students, apprentices, or distance learners, at any stage of their journalism training.

Centres: Encompasses training providers, HEIs, FE colleges and commercial centres.

Conflict of interest - A conflict of interest exists when:

- The NCTJ staff's involvement in an activity could compromise its ability to develop, deliver and award qualifications and end-point assessments in line with regulatory requirements.
- A person connected to NCTJ to the development, delivery and award of qualifications and end-point assessments has other interests that could influence their actions and impact compliance with regulations.

- An informed and reasonable observer would conclude that either of these situations applies.

## **4. Policy statements**

The NCTJ acknowledges the potential for conflicts between its awarding organisation/EPAO role and its training provider role. To prevent this, a clear separation ('firewall') exists between the responsibilities of these two functions.

The NCTJ is committed to:

- Preventing and minimising conflicts of interest.
- Identifying, managing, and mitigating any adverse effects of conflicts.

### **4.1 Principles**

This policy is underpinned by the following principles:

- Openness and fairness in identifying and addressing conflicts.
- Open and regular dialogue between the teams within the NCTJ
- Avoiding trainer involvement in qualification or end-point assessments development.
- Ensuring 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).
- Ensuring that when centre tutors help develop assessment materials, they sign an annual declaration to confirm they will protect the confidentiality of assessment materials. Any breach or suspected breach of confidentiality will be treated as malpractice and addressed under the NCTJ's malpractice and maladministration policy.

The NCTJ will provide guidance to centres on managing and preventing conflicts of interest in assessments. The NCTJ states that centres must not offer financial rewards to staff based on candidate assessment outcomes, beyond standard pay for their role. Any such practice may be treated as malpractice and addressed under the NCTJ's malpractice and maladministration policy.

## **4.2 Roles and responsibilities**

- All staff and stakeholders:
  - Conduct activities in line with NCTJ's aims to ensure valid qualifications and assessments.
  - Identify and declare any potential or actual conflicts to the chief executive.
  - Monitor their roles to avoid compromising NCTJ's integrity.
  - If a conflict or potential conflict is identified, it must be reported to the chief executive, even if there is uncertainty about its significance.
- NCTJ Chief Executive:
  - Review reported conflicts.
  - Decide and implement solutions to manage conflicts.
  - Ensure monitoring and reporting are carried out effectively.
- NCTJ boards and committees:
  - Journalism Qualifications Board: Provides oversight of syllabuses, assessments, and awards to safeguard credibility and relevance.
  - Quality Assurance and Standards Committee: Reviews conflicts, monitoring activities, and this policy annually.
  - Accreditation Board: Ensures fair and transparent delivery of qualifications by approved centres.
- Head of Awarding:
  - Maintain conflict of interest logs and ensure regular reviews.
  - Oversee recording, reporting, and monitoring of conflicts.

## **5. Procedures**

### **5.1 Declare the conflict**

Individuals or stakeholders must declare an identified potential or actual conflict to the chief executive.

### **5.2 Resolve the conflict**

The chief executive, or a designated alternative if the conflict concerns the chief executive, will discuss the conflict with relevant individuals and involve appropriate parties to determine the resolution.

The NCTJ will take all reasonable steps to ensure that no conflict of interest which relates to it has an adverse effect. Where such a conflict has had an adverse effect, the NCTJ will take all reasonable steps to mitigate the adverse effect as far as possible and correct it.

### **5.3 Decision and actions**

Once a decision regarding the resolution on the conflict has been made, actions may include:

- Reorganising activities to mitigate the actual or potential conflict.
- Obtaining a commitment from the individual or stakeholder to conduct their responsibilities so that the integrity of the NCTJ and its qualifications is maintained.
- Continuous monitoring to ensure the actual or potential conflict does not cause an adverse effect.

If unresolved, another solution must be agreed, and an independent party may assist at the request of the chief executive.

In extreme circumstances, activities may need to be restricted. The chief executive's decision as to how the conflict or potential conflict is managed is final.

If a breach of a conflict of interest is classified as a potential or actual adverse effect then the head of awarding will promptly inform Ofqual (and/or other regulators, as required) in accordance with our procedure for dealing with adverse effects. In doing so they will inform the regulator(s) of the reasonable steps that we have taken or intend to take to prevent, correct or mitigate the adverse effect, including a detail of any reviews we are/will carry out.

### **5.4 Recording and reporting**

#### **5.4.1 External stakeholders:**

All identified potential or actual conflicts of interest, including how the conflict will be mitigated, whether the conflict was broken and the details of any corresponding investigation(s), will be recorded on the NCTJ's conflict of interest log in Creatio.

Regular team or other meetings may also present the opportunity to declare potential conflicts. If there is any doubt that the situation represents a potential conflict, it is recommended that it should be declared.

#### **5.4.2 Internal stakeholders (NCTJ Staff):**

All identified potential or actual conflicts of interest, including how the conflict will be mitigated, whether the conflict was broken and the details of any corresponding investigation(s), are recorded using a Conflict of Interest (COI) declaration form in the staff declaration log in Creatio and reviewed annually.

All internal stakeholders are required to manage and monitor any identified conflicts of interest that relate to their area of operations. Should the status of any identified conflict, or the associated controls change, then the manager for the team should inform the chief executive, update Conflict of Interest (COI) declaration form and send this to the head of awarding.

#### 5.4.3 Potential Conflict Table:

To aid with the identification of conflicts of interests the NCTJ also maintains a table of potential conflict of interest scenarios (Appendix 1) which is completed each time a scenario is identified and recognised. This updated regularly to identify and track new scenarios.

## 6. Regulatory references

UK regulators require all awarding organisations to establish and maintain their compliance with regulatory conditions and criteria. As part of this process, policies that relate to NCTJ's status as an awarding organisation will reference any conditions and criteria that they address.

This policy addresses the following regulatory criteria and conditions:

<b>Regulator</b>	<b>Regulatory document</b>	<b>Conditions of Recognition</b>
Ofqual	General Conditions of Recognition	A4
CCEA	General Conditions of Recognition	A4
Qualifications Wales	Standard Conditions of Recognition	A4

## 7. Review arrangements

The NCTJ will review this policy annually as part of the NCTJ's annual self-evaluation arrangements and revise it as and when necessary, in response to customer, learner or regulatory feedback.

If you would like to feedback any views, please contact us via the details provided at the end of this policy.

This policy will be reviewed in September 2025.

## **8. Contact us**

Any queries in relation to the contents of this policy, please contact our head of awarding.

Telephone: 01799 544014

Email: [info@nctj.com](mailto:info@nctj.com)

## 9. Appendices

### Appendix 1 - 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
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.	<p>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.</p> <p>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.</p>	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



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>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</p>	<p>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.</p> <p>All NCTJ exam board members have signed an examiner agreement with a confidentiality clause in it.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Head of awarding, chief executive and subject board chairs</p>	<p>Exam subject boards</p>	<p>Exam boards meet twice a year which includes discussions on COIs and exam setting process. Agendas and minutes. Ongoing review by Head of Q&amp;A and self-evaluation</p>	<p>NCTJ and examiners attend exam board meetings. Potential conflicts/risks identified and monitored</p>

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>Members of the main board, senior management team, Journalism 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>All staff and members in attendance at NCTJ meetings will be required to declare, at the 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.</p> <p>Any staff COIs are logged in Creatio.</p> <p>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.</p>	<p>Chief executive, head of qualifications, head of awarding, quality and standards manager</p>	<p>All boards and committees</p>	<p>Annual self-assessment checks, agendas and minutes.</p>	<p>Ongoing agenda item negates potential risks.</p>

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>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"> <li>• the nature and extent of the conflict;</li> <li>• an outline of the discussion;</li> <li>• the actions taken to manage the conflict.</li> </ul>				
<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 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</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>

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
	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.</p> <p>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.</p>	Head of awarding and subject board chairs	Management team and subject exam boards	Annual review as part of self-assessment	No issues identified

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
	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>Allocating spot checkers to centres that may have a conflict of interest such as:</p> <ul style="list-style-type: none"> <li>• has worked for the centre,</li> <li>• has worked for a competitor centre,</li> <li>• has a family member working at the centre,</li> <li>• has a financial stake or shares in the centre</li> <li>• is a governor at the centre.</li> </ul>	<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.</p> <p>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 occurred.</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
Ensuring centre-based assessments are not undertaken by any person who has a personal interest in the result of	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	Head of awarding and quality and	Accreditation board	Ongoing	Conflicts of interest policy and malpractice and

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
the assessment (e.g. someone assessing the work of a family member; or someone whose pay is influenced by positive assessment results).	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.	standards manager			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	Head of awarding	Subject exam boards	Ongoing	Conflicts of interest policy issued to external examiners and malpractice and maladministration policy published on NCTJ website.

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
	dealt with through NCTJ's Malpractice and Maladministration Policy.				
Ensuring that all contracted staff (e.g. consultants and suppliers) sign appropriate service agreements/contracts that include relevant clauses that govern 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.	<p>All external parties recruited for specific activities will be required to sign an appropriate service level agreement along with a non-disclosure agreement.</p> <p>With the normal process being to invite them to respond to a tender/work specification, shortlisted and interviewed before a final selection is made based on the relevant experience, expertise and track record.</p> <p>They will be asked to declare any conflicts of interest in accordance with their duty of confidentiality and/or any other legal duty.</p> <p>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</p>	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.

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
	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.	<p>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.</p> <p>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.</p> <p>Offers of one-off gifts should be politely but firmly declined. If they are pressed, the recipient should inform their line manager.</p> <p>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.</p>	Senior management team	Main board	Reminder to staff annually	Ongoing  Added to employee handbook



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
	Any staff COIs are logged in Creatio.				
Chief examiners may act as moderators when exams are set and marked. They also attend and facilitate tutor marking workshops which may affect maintaining confidentiality of assessment materials at training events.	<p>All chief examiners have signed and returned an examiner service-level agreement. There is always an NCTJ person at tutor marking workshops to ensure confidentiality of exam materials is maintained.</p> <p>Exam scripts contain candidate numbers only so examiners cannot identify candidates that may be known to them when marking or moderating exams.</p>	Chief executive, head of awarding, head of qualifications	Subject exam boards	Regular updates at staff meetings on workshops and issues raised about marking or moderation, Workshop evaluations discussed at relevant subject exam boards	NCTJ rep records confirmation of confidentiality of exam materials at each workshop held on booking spreadsheet.