



PROFESSIONAL TEACHERS OF DANCING CONFLICT OF INTEREST POLICY

ISSUE AND REVIEW:

This is version 2 (January 2022) of the PTD Conflict of Interest Policy. The policy is subject to regular revisions.

GENERAL INFORMATION

The PTD's activities and those engaged with all PTD activities must be free from conflicts of interest that could affect their judgement and objectivity. The PTD takes responsibility for ensuring that it identifies and manages potential conflicts of interest where they apply to management, examiners, staff, contractors and consultants.

DEFINITION OF CONFLICTS OF INTEREST, as defined in the *General Conditions of Recognition* August 2018, updated November 2020 (published by Ofqual).

A conflict of interest exists in relation to an awarding organisation where:

- (a) Its interests in any activity undertaken by it, on its behalf or by a member of its Group have the potential to lead it to act contrary to its interests of the development, delivery and award of qualifications in accordance with its Conditions of Recognition
- (b) A person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisation's Conditions of Recognition, or
- (c) An informed and reasonable observer would conclude that either of these situations was the case.

A conflict of interest is any situation in which an individual's personal interests or loyalties could or could be seen to prevent them from making a decision or acting only in the best interests of the PTD. A conflict of interest exists where there is the possibility that an individual's personal or wider interests could influence their ability to act in the best interest of the PTD, and potentially lead to a breach of the Conditions of Recognition or to act unlawfully.

EXAMPLES OF CONFLICTS OF INTEREST

- An individual entering into a financial or operational agreement with an organisation or individual in which they have a vested interest.
- The interests of one job held by an individual contradicts another job held by that same individual (e.g. a person working for two competing organisations).

- A partner, child or other close relative of an individual is employed (or applies for employment) by the PTD.
- An examiner carrying out assessment has personal links with the individuals they are assessing.
- Goods or services are purchased from a relative of an individual or an organisation controlled by a relative.
- Gifts are accepted from others to promote their interests within the PTD.

IDENTIFICATION OF CONFLICTS OF INTEREST

The PTD will carry out continuous monitoring of operations and annual monitoring through the completion of the Declaration of Conflict-of-Interest form (see Appendix 1 for Declaration of Conflict of Interest form) of all individuals involved with the PTD to ensure that any conflicts of interest in relation either to the activities of the PTD, or to the activities of others working for the PTD are identified and resolved as soon as possible.

Conflicts of interest are identified through:

1. *The recruitment process for PTD management, contractors, examiners, staff and consultants*
 - On receipt of an application to work for the PTD in any capacity an individual's CV will be checked to identify any potential areas for conflict of interest. If any areas are identified they will be discussed further with the individual during the interview process.
 - When an examiner is appointed, they will be required to complete and sign a form declaring where they currently and recently have worked so that they are not allocated work from those schools to ensure there is no conflict of interest. If there is a change in the individual's circumstances, they will be asked to notify the PTD.
 2. *Declarations of conflict of interest made by:*
 - PTD Management
 - PTD Contractors (including examiners, consultants and other contractors)
 - PTD Staff
- All PTD management, contractors, staff and consultants will be expected to declare annually any conflicts of interest that may prevent them from carrying out their roles objectively and to notify the PTD if their circumstances change.
 - If a PTD examiner is involved in the development of a syllabus and will then examine that syllabus the syllabus will be subject to scrutiny by an external consultant to ensure that the syllabus will meet the needs of all learners and has no bias towards any specific group or type of learners.

CONFLICTS IN RELATAION TO CONFIDENTIAL MATERIAL

All information provided to the PTD will be processed in accordance with the General Data Protection Regulations 2018 and GDPR.

All individuals involved with the PTD who have had access to confidential examination information are required to provide details of any conflicts of interest including personal conflicts, for example, where a child, sibling or other family member is due to take the examination in relation to which the person has confidential examination information and where a partner or other close family member is teaching.

MANAGING POTENTIAL CONFLICTS OF INTEREST

Once a potential conflict is identified and has been reported to PTD Quality Assurance Committee via an annual declaration or through periodic monitoring by the Quality Assurance Committee the PTD will:

Record and log the potential conflict to show:

- The name of the person/s declaring the potential conflict
- When the conflict was declared
- The nature of the conflict
- The decision made about how to manage the conflict

The PTD endeavours to mitigate any potential conflicts before they pose a risk to the PTD or could have an adverse effect on the PTD. This is achieved through regular monitoring and submission of the annual declaration of conflict of interest form to PTD Quality Assurance Committee. The Quality Assurance Committee will assess the risk of potential conflicts occurring and the actions taken to mitigate conflicts of interest.

A conflict of interest that has been logged will be managed under the following headings:

- *Does not pose a risk*

In cases where the potential conflict does not currently pose a risk, the conflict will be monitored over time to assess whether there are any changes to individual job roles or responsibilities that might pose a risk in the future.

For example, where a member of staff has family members who may be undertaking PTD examinations but does not have responsibility for any areas of PTD operations that might put them in conflict

- *Poses a risk if not managed appropriately*

In cases where the potential conflict may pose a risk if not managed appropriately, the conflict will be noted in the log and brought to the attention of the Quality Assurance Committee to agree the mitigations of the conflict. These could include:

For example, where an PTD member of staff knows a PTD candidate – this would involve allocating the administration for that candidate's examination to another member of staff.

For example, where a PTD examiner declares a personal or professional relationship with an individual candidate or teacher holding an examinations session – this would involve reallocating the examiner to another examination session.

- *Poses a significant risk*

In cases where the potential conflict poses significant risks and cannot effectively be managed by redeployment or by other form of mitigation appropriate actions will be agreed by the Quality Assurance Committee.

For example, withdrawal of an offer of employment to a member of staff or examiner on the basis of conflict of interest.

THE MONITORING OF CONFLICTS OF INTEREST

As well as the expectation that conflicts will be declared on an annual basis by:

- PTD Management (monitored by Quality Assurance Committee)
- PTD Contractors (including examiners, consultants, and other contractors) (Quality Assurance Committee)
- PTD Staff (monitored by management)

Conflicts of interest will also be monitored through

- Periodic reporting to the Quality Assurance Committee of potential conflicts for discussion and action.
- Monitoring of examination session teacher/examiner relationship by Head of Examinations.
- Checks with PTD committees, contractors, and staff that any changes to roles and responsibilities do not indicate a potential conflict.
- Examiner training to ensure and reinforce neutrality, objective assessment and professional practices, which are backed up by standardisation activities. (Head of Examinations)
- Monitoring of results before release to teachers and candidates. (Head of Examinations)

Appendix 1

Professional Teachers of Dancing

Declaration of Conflict of Interest

The information you provide is confidential and will be treated as such under the terms of the Rehabilitation of Offenders Act 1974, the Data Protection Act 2018 and GDPR.

Name	
Position	

Please answer the following questions, Yes (Y) or No (N).

		Y/N
1	Is there any relationship, internal or external to the PTD which you feel could cause potential or perceived conflict of interest with your PTD activities?	
If Yes , please provide further details: <i>e.g. relative taking PTD qualification</i>		
2	Do you have a direct or indirect financial interest in a PTD competitor, supplier or customer?	
If Yes , please provide further details: <i>e.g. acquaintance is MD of potential supplier</i>		
3	Do you have a second job or consulting relationship - which may affect your ability to satisfactorily perform your PTD duties and obligations? - with an employer who is a direct or indirect competitor, customer, supplier or distributor of the PTD?	
If Yes , please provide further details: <i>e.g. organisation(s) worked for, duties performed, time spent working</i>		
4	Do you hold any position or appointment as an executive or non-executive director or company secretary in any company other than the PTD?	
If Yes , please provide further details: <i>e.g. position, name of company, date of appointment</i>		
5	Are you aware of any other relationships, interests, activities or circumstances which could constitute a conflict of interest, or potential conflict of interest, with your position in the PTD?	
If Yes , please provide further details:		

I confirm that I have completed this Declaration of Conflict of Interest to the best of my knowledge and that the information in this form is true and correct.

Print name	
Signed	
Date	

For Office use

Disclosure reviewed	<i>Date</i>
Approved or resolved – no further action required	<i>Signed</i>

Further evidence/investigation required:	<i>Signed</i>
Evidence Required:	
To be reviewed again by: (e.g. Quality Manager)	<i>Title:</i> <i>On Date:</i>
Approved or resolved – no further action required	<i>Signed:</i>