

Conflicts of Interest Policy

1. Definition of conflicts of interest

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 in the development, delivery and award of qualifications in accordance with its Conditions of Recognition; or
- (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 their 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 situation (a) or (b) was the case.

2. To whom does this policy apply?

Conflicts of interest can take many forms (see Section 4) and apply not only to Directors, staff and contractors engaged by the SDTA, but also to dance schools (hereinafter referred to as "providers").

The SDTA takes responsibility for ensuring that it identifies and manages potential conflicts of interest where they apply to its Directors, staff and contractors.

Providers take responsibility for identifying and managing potential conflicts of interest, reporting these regularly to the SDTA which is responsible for monitoring them. Providers must ensure that they are familiar with the content of this policy and operate their own internal processes accordingly.

3. How the SDTA identifies conflicts of interest

Conflicts of interest are identified through:

- (a) The recruitment process for the SDTA staff and Examiners.
- (b) Declarations of conflicts of interest made by:
 - the SDTA Directors
 - the SDTA staff, contractors, Examiners.
- (c) The monitoring of conflicts of interest:
 - By the SDTA Executive Council for members of staff.
 - By SDTA staff in relation to Directors and external and freelance third-party contractors, including Examiners and contractors.

4. Examples of potential conflicts of interest

Potential conflicts of interest could include:

- 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 or in two conflicting roles within one organisation (e.g. Assessor and Internal Verifier));
- a partner, child, or other close relative of an individual is employed (or applies for employment) by an organisation;
- an individual carrying out assessment has personal links with the individuals they are assessing (known as “interests in assessment”);
- 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 organisation;
- where an Examiner has personal or professional connections with a teacher or candidate to whom they are assigned or with a provider to which they are assigned; and
- where an Examiner has a personal connection with a candidate undergoing assessment at a provider to which they are assigned or with a teacher to whom they are assigned.

5. Conflicts in relation to confidential materials

The SDTA sets out obligations in its contractual arrangements for staff and third parties who have access to confidential assessment information which may arise from other activities they may carry out.

These contractual arrangements require staff and third parties who have, or have had, access to confidential assessment information through the assessment development process (including quality assurance) to provide details of:

- all instances in which such a person is, or has been, a teacher for the relevant qualification, or is employed by a Provider at which that qualification is taught or delivered (even if that person does not themselves teach or deliver the qualification); and
- all other conflicts of interest including personal conflicts such as, for example:
 - (a) where a child, sibling, or other close family member is due to take the assessment in relation to which the person has confidential assessment information; and
 - (b) where a partner or other close family member is teaching, or is due to teach, the relevant qualification.

6. Managing potential conflicts of interest

Once a potential conflict is identified via an annual declaration or through periodic monitoring of conflicts of interest, the SDTA will:

- log the potential conflict;
- determine whether the potential conflict:
 - (a) does not pose a risk;
 - (b) poses a risk if not managed appropriately; or
 - (c) poses a significant risk;
- escalate any conflicts posing a risk to the Examinations Standards Board for a decision and action.

In all cases, the SDTA seeks to mitigate any potential conflicts before they pose a risk to the organisation or cause an Adverse Effect.

The SDTA sets a five-year limit on potential conflicts of interest. Therefore, any historical personal or professional links that an individual has with a provider, individual or organisation which have ended over five years from the point of declaration would not be considered as a potential conflict unless the individual declares that personal and/or professional links are still valid and may have an impact.

In cases where the potential conflict does not currently pose a risk, the conflict will be noted in the log and monitored over time to assess whether any changes to individual job roles or responsibilities might pose a risk in the future. Examples of this type of conflict may include:

- where a contractor works for another awarding organisation but not in the same capacity or sector;
- where a member of staff has family members who may be undertaking the SDTA examinations but does not have responsibility for any areas of the SDTA operations that might put them in conflict; and
- where an Examiner has historical links with a provider but does not know current members of staff in a personal or professional capacity.

In cases where the potential conflict may pose a risk if not managed appropriately, the conflict will be noted in the log and referred to the Examinations Standards Board to decide upon appropriate mitigations to the conflict. These could include:

- where an Examiner declares a personal or professional relationship with an individual candidate, teacher or provider – this would involve reallocating the Examiner to another examination session;
- where an SDTA member of staff knows an SDTA candidate – this would involve allocating the administration for that candidate's examination to another member of staff; and

- where a committee or Governing Body member has a potential conflict with a particular decision being made by the SDTA – this would involve that member absenting themselves from any decisions made.

In cases where the potential conflict poses significant risks and cannot effectively be managed by redeployment or by another form of mitigation, the conflict will be noted in the log and referred to the Examinations Standards Board to agree actions.

7. Monitoring Conflicts of Interest

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

- Directors
- Staff
- Contractors (including Examiners)

Conflicts of interest will also be monitored through:

- regular reports to the Examinations Standards Board and Executive Council of potential conflicts for discussion and action;
- monitoring of examination venues; and
- checks with Directors, staff and contractors that any changes to roles and responsibilities do not indicate a potential conflict.