

Department of Education & Policy

Conflict of Interest

1. Introduction

Having appointed Visitors to 65 visits across nine professions, it has become apparent there is a range of conflict of interest issues across all professions and particularly in relation to smaller professions.

A number of difficulties have arisen in the appointment of Arts Therapy Visitors, and in particular, Dramatherapy. There are six Dramatherapy programmes in the UK for which we have only three Dramatherapy Visitors. We are actively recruiting additional Dramatherapists, however even with the additional appointments, the rate of conflict of interest will remain high. The majority of individuals with the appropriate qualifications and experience to act as HPC Visitor, are likely to either be directly involved with a programme, or acting as an external examiner for it.

While at this stage these difficulties have only been apparent in Arts Therapy, similar problems will inevitably arise for:

- Prosthetists and Orthotists – there are only two programmes in the UK
- Maxillofacial Prosthetists and Technologists – if this profession were to be successfully regulated by HPC, there is only one specialist programme currently available in the UK.

In addition, even within large professions, for example Occupational Therapy, Physiotherapy and Radiography, there have been difficulties appointing Visitors who do not have a conflict of interest. While each of these professions has over 50 programmes in the UK, the academic component of the profession remains small and the majority of HPC Visitors are acquainted with one other and often share work histories.

Currently, the general guidelines used by the Education and Policy department to determine a conflict of interest are as follows:

A conflict of interest applies if:

- The team delivering the programme includes an immediate family member of the visitor;
- The Visitor is currently on, or has in the previous 5 years been on, the payroll of the education provider in any capacity
- The Visitor currently, or within the last three years, has been a placement educator for the department offering the programme

However, it is clear from the above that this policy will come across difficulties, particularly in the case of professions with limited numbers of educational programmes or providers.

2. Decision

The committee is asked to agree the following process for dealing with a conflict of interest.

The Education Officer (or other member of staff assigning Visitors to an approvals event) will:

- in the first instance, endeavour to find Visitors with no conflict of interest;
- if this is not possible, seek to minimise the conflict of interest (this might include, for example, approaching visitors whose link with the education provider took place several years ago, rather than one whose link is recent or current).

If the only Visitor who is available is someone with a conflict of interest, then the Education Officer will ask the Visitor to send a description of their link with the Education provider. This can be sent in by email.

The description of the conflict of interest, once received by the Education Officer, will be examined, and if appropriate, approved by the Education Manager.

It will then be forwarded to the Education provider, and the Education provider will be asked if they wish the visit to proceed using this visitor. If so, the Education provider will be asked to confirm this.

The description of the conflict of interest (approved by the Education Manager, and by the Education provider) will then be added to the file for the visit by the Education Officer.

It is considered that this process strikes an appropriate balance between

- the need to ensure that the approvals process is fair and transparent; and
- the need to work pragmatically within current resource constraints.

3. Background Information

None

4. Resource Implications

None

5. Financial Implications

None

6. Background Papers

None

7. Appendices

None