

Conflicts of Interest Policy

Statement of Intent

This policy has been established to safeguard the integrity and credibility of the *Active Swim*. In addition, to promote public confidence in the objectivity and impartiality of activities by providing a systematic approach for individuals who prepare documents, participate in a project, conference or other specified associated activity. Aiming to draw attention to the possibility of conflicts of interest, this policy provides a robust and transparent framework for identification and management procedures by:

- identifying conflicts that may affect the safety and accuracy of results e.g conflicts between assessors/IV and assessors/ between learners and /or between members of staff.
- not attempting to cover every situation where a potential COI might arise.

Definition of a Conflicts of Interest

A Conflicts of Interest (COI) is a situation in which an individual, in a position of trust, has a direct or indirect, competing professional or personal interests. This will include financial interests, however those interests that are not financial are also just as important. Friendship, membership of an association, society, trusteeship and many other kinds of relationships can sometimes influence judgements and give an impression that personal motives are involved.

Therefore, such competing interests can make it difficult for individuals to fulfil their duties because it could:

- impair the individual's objectivity
- create an unfair advantage for any person or organisation.
- working with another Swim England approved Centre within a local area

An appearance of a COI can be just as damaging as the existence of a real conflict. An apparent COI arises when a reasonable person, with knowledge of the relevant facts, would question the impartiality of the individual in the matter being considered.

Identification of conflicts Register of interests

All affected persons shall declare management any interest, direct or indirect, which may or is expected to have an impact upon their participation. This could include the individual:

- could make a financial gain, or avoid a financial loss
- has an interest in the outcome of a service provided to a customer
- has a financial or other incentive to favour the interest of any customer over the interests of another customer
- receives, or will receive from a person other than a customer, an incentive in relation to a service provided to a customer in the form of monies, goods or services.

Declaration of interests

Affected Persons engaging with the development, delivery or award of *Swim England Qualifications* or other services must declare any interests and Information for declaration must include:

- the type of interest
- the nature of the interest
- a description of all parties involved in the interest (financial or non-financial), and any other relevant information.

In any event, the interest must be declared immediately prior to engaging with any activity relating to the development and/or delivery in which the Affected Person has an interest.

The group shall require the Affected Person to leave the room at that stage. In the absence of the Affected Person, the group members will then decide whether the Affected Person may, notwithstanding their interest, take further part in the consideration, discussion or voting on any question relating to the matter affected by the interest. This may include not allowing to vote on specific questions related to the area, and return to the meeting, where appropriate.

A completed Conflict of Interest Declaration form will be retained and filed confidentially and will be respected as far as possible. The information will only be shared on a need to know basis

Individuals remain under a continuing obligation to declare interests as they arise. Therefore, should circumstances change after the initial declaration, or new situations arise, the Affected Person must promptly disclose all relevant information through completion of the updated Conflict of Interest Declaration form

Management of conflicts

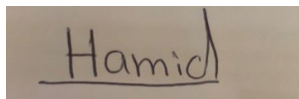
To implement this policy, based on the declaration and supporting information received it will be determined if the affected personal has an actual, potential or apparent conflict of interest. It may be required that appropriate actions are taken to reduce or remove any identified conflict of interest by:

- Disclosure to other interested parties
- Restricting access to particular information
- Rearrangement or transfer of responsibilities e.g. appointing an alternative assessor
- Increasing the level of internal verification for an affected learner, with COI
- Replacement of the individual

For any conflicts, please contact:

Mr H Anwary
10 Burgundy Court
31 Arla Place
Ruislip
HA4 0GD

hamid@activeswim.co.uk

A rectangular box containing a handwritten signature in black ink that reads "Hamid".

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Conflicts of Interest Declaration Form

All staff are required to declare any conflicts of Interest, when working with Active Swim
Should a change in circumstance or new situation occur after completing the original declaration a further form should be completed as required.

Person making this declaration

Name:	
Address:	
Phone no:	
Email:	

Information of this declaration

Type of Interest	
Nature of Interest	
Description of the parties involved and any other relevant information (including financial or non-financial)	

The information you provide will be held and filed confidentially. We respected the information provided and will only be shared with those on a need to know basis.

I acknowledge the above interests exist and that I will inform the key contact in the event that there is any changes in my circumstances

Signed:		Date:	
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Appendix 1

<p>The assessment process of a qualification</p> <p>A learner who is known, or perceived to be known, personally (in a relationship with, or a spouse) or professionally (employer, staff member, colleague etc). For example, a learner knows the tutor.</p> <p style="text-align: center;"><u>OR</u></p> <p>A member of the Qualification Workforce (Assessor/Internal Verifier) or Quality Assurance Workforce (Internal Verifier/ External Verifier / Centre Reviewer) who is known, or perceived to be known, personally (in a relationship with, or a spouse) or professionally (employer, staff member, colleague etc)</p>	<ul style="list-style-type: none"> • To avoid COI arising the affected individuals must declare the conflict in writing, and verbally: <i>Assessor/Verifier to Active Swim</i> • External Verifier to SEQ and remove themselves from participating in any assessment of the affected learner(s) • <i>Active Swim</i> will replace the affected individual with a suitably qualified person to conduct the assessment • The Tutor will record on the Learner Achievement Summary that <i>Active Swim</i> to SEQ • If the affected individual unable to be replaced, therefore an additional, suitably qualified person is acquired to scrutinise assessment outcome and; <i>Active Swim</i> to notify SEQ of conflict and SEQ to decide for affected course to be externally verified 	
<p>A Swim England tutor who is working with another Swim England Approved Centres within a 10-mile radius and a month's time scale either side of ACTIVE SWIM courses</p>	<ul style="list-style-type: none"> • To avoid COI arising the affected Approved Centre must declare the COI in writing, and verbally to <i>Active Swim</i> and Swim England tutors • <i>Active Swim</i> will replace with a suitably qualified person to tutor and assess the course • <i>Active Swim</i> to notify SEQ of conflict as too many courses in one area may be detrimental to Swim England Qualifications courses running. 	