



### Conflict of Interest Policy

Approved by:	Ray Lau
Signed:	<i>Ray Lau</i>
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## Conflicts of Interest Policy

### Statement of Intent

This policy has been established to safeguard the integrity and credibility of the *Active Swim*. In addition, it promotes public confidence in the objectivity and impartiality of activities by providing a systematic approach for individuals who prepare documents and 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:

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

### Definition of a Conflict of Interest

A Conflict of Interest (COI) is a situation in which an individual, in a position of trust, has 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 in an association, society, trusteeship, and many other kinds of relationships can sometimes influence judgements and give the 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

The 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 Registers of interests.

All affected persons shall declare to management any direct or indirect interest that may or is expected to impact 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.

The interest must be declared immediately before engaging in 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 voting on specific questions related to the area and returning to the meeting, where appropriate.

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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 by completing 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 personnel 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 R Lau

[swimeducation@activeswim.co.uk](mailto:swimeducation@activeswim.co.uk)

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### Conflicts of Interest Declaration Form

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

#### The 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 it will only be shared with those on a need-to-know basis.

I acknowledge the above interests exist and will inform the key contact if there are any changes in my circumstances.

Signed:		Date:	
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## Conflicts of Interest Policy

### Appendix 1

<p><b>The assessment process for a qualification</b></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;"><b><u>OR</u></b></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"> <li>• To avoid COI arising, the affected individuals must declare the conflict in writing and verbally: <i>Assessor/Verifier to Active Swim</i></li> <li>• External Verifier to SEQ and remove themselves from participating in any assessment of the affected learner(s)</li> <li>• <i>Active Swim</i> will replace the affected individual with a suitably qualified person to conduct the assessment</li> <li>• The Tutor will record on the Learner Achievement Summary that <i>Active Swim</i> to SEQ</li> <li>• If the affected individual is unable to be replaced, therefore an additional, suitably qualified person is acquired to scrutinise the assessment outcome and; <i>Active Swim</i> to notify SEQ of the conflict and SEQ to decide for the affected course to be externally verified</li> <li>• Internal staff members will be internally verified to ensure the <b>impartiality</b> of the assessment.</li> </ul>	
<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 on either side of ACTIVE SWIM courses</p>	<ul style="list-style-type: none"> <li>• 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</li> <li>• <i>Active Swim</i> will replace with a suitably qualified person to tutor and assess the course</li> <li>• <i>Active Swim</i> will notify SEQ of conflict as too many courses in one area may harm Swim England Qualifications courses running.</li> </ul>	