



# Swim Wales Training and Development Conflict of Interest Policy

## DOCUMENT STATUS

Prepared by	Barrie Swift
Original Document produced	April 2018
Review Date	Annually

## DOCUMENT CONTROL INFORMATION

Change History		
Version	Date	Details of changes
V2	12/02/2019	Amendments to existing policy
V3	20/05/2019	Amendments to existing policy
V4	02/04/2020	Amendments to existing policy
V5	18/09/2020	Amendments to existing policy

The aim of Swim Wales, as a Swim England Approved Training Centre is to ensure that learners are accurately and securely certificated. As a service provider, and across its education & training function, Swim Wales is committed to ensuring individuals engaging with any activity concerning the development, delivery and award of Swim England qualifications for the awarding organisation, in partnership with the awarding organisation or on behalf of the awarding organisation do so confidentially, honestly, fairly and with integrity, objectivity, due skill, care and diligence.

### **Policy aim and purpose**

This policy has been established to safeguard the integrity and credibility of Swim Wales services and functions, and to promote public confidence in the objectivity and impartiality of

The policy will:

- Draw attention to potential Conflict of Interest (COI) situations
- Establish clear standards for dealing with COI
- Reduce the possibility of COI in relation to Swim Wales
- Provide the means to identify and resolve COI

This policy has been designed as a general policy and reference point.

This policy applies to all Swim Wales staff and other individuals that interact or potentially interact with Swim England Qualifications.

### **Definition of a COI**

A COI is a situation in which an individual, has competing interests or loyalties

COI can arise in a variety of circumstances, for example:

- An assessor/educator may have a friend, relative or member of their staff on their course
- The same can be true for an Internal Verifier (IV) and/or they may be close friends with the assessor whose work they are verifying.



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

- Impair the individual's objectivity, or
- Create an unfair advantage for any person or organisation
- Place the organisation's credibility at risk

### **Identification and management of conflicts of interest**

All individuals are entitled to manage their own affairs in privacy; however when those affairs give rise to actual or potential detriment to the nature of Swim Wales business, attention should be drawn to it.

Any individual who considers there may be an actual, potential or perceived COI must subscribe to the *Conflict of Interest Register* by completing a *Conflict of Interest Declaration*, monitored by the Swim Wales Training & Development Manager, declaring any interest, whether direct or indirect, which may have or is expected to have, an impact upon activities. Examples include where someone:

- Is likely to make a financial gain, or avoid a financial loss
- Has an interest in the outcome of a service provided
- Is employed by the same business as a customer

The COI must be declared, where possible, prior to engaging with any activity. If a COI is not known prior to engaging with any Swim England qualification then the person who may have the COI must withdraw from the activity and seek clarification from Swim Wales by completing the declaration.

If the COI is as a result of a change of circumstances, this will need to be recorded on a *Change of Circumstances* form. Swim Wales will review all declarations and inform those involved of the decision in a timely manner.

### **Confidentiality**

Confidentiality must be assured at all times. Therefore those involved must not:

- divulge any confidential information acquired to any person not authorised by Swim Wales
- use any confidential information in any personal undertaking

### **Monitoring & Review**

This policy will be reviewed annually to ensure it remains fit for purpose and reflects the types of conflicts and interests that may arise, and how those conflicts and interests are managed.

The next policy review will take place in March 2021

Swim Wales Training & Development

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### **Appendix 1: Conflict of Interest Declaration**

This form is to be completed by all individuals engaging with the development, delivery or award of Swim England accredited qualifications and/or other Swim England Qualifications (SEQ) service. Individuals must declare any interests, direct or indirect, competing professional or personal interests that may conflict with the interests of the Swim England Qualifications (SEQ), or if no conflict of interest is known, this must also be declared.

<b>Details of person making the declaration</b>	
Full Name	
Address	
Contact Number	
Email	

#### **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.

<b>Declaration</b>

*N.B: Please continue on a separate sheet of required and ensure all information is collated together when submitted.*

The information you provide will be retained and filed confidentially and will be respected as far as possible; the information will only be shared with those with a need to know. I acknowledge the above interests exist and that I will inform the Swim England Qualifications (SEQ) in the event that there is any change in my circumstances.

<b>Signed:</b>		<b>Date</b>	
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## **Appendix 2: Conflict of Interest: Change in Circumstance**

This form is to be completed by all individuals engaging with the development, delivery or award of Swim England accredited qualifications and/or other Swim England Qualifications (SEQ) service, which after their initial conflict of interest declaration, have a change in circumstance.

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 to the Swim England Qualifications (SEQ).

<b>Details of person making the declaration</b>	
<b>Full Name</b>	
<b>Address</b>	
<b>Contact Number</b>	
<b>Email</b>	

### **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.

<b>Declaration</b>

*N.B: Please continue on a separate sheet of required and ensure all information is collated together when submitted.*

The information you provide will be retained and filed confidentially and will be respected as far as possible; the information will only be shared with those with a need to know. I acknowledge the above interests exist and that I will inform the Swim England Qualifications (SEQ) in the event that there is any change in my circumstances.

<b>Signed:</b>		<b>Date</b>	
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