



Conflict of Interest Policy

Approved by:	Scott Machen
Signed:	<i>Scott Machen</i>
Date approved:	Mar 2026
Date review:	Mar 2027
Version No:	V3.2

V3.0	May 2024	Policy written and amended
V3.1	Apr 2025	Updated Appropriate Awarding Bodies (AAB). Changes to include governance as COI. Added SEQ types of COI and template to be completed. Recording COI on the IV monitoring document for overview purposes.
V3.2	Mar 2026	Tweaking of roles and wording

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Statement of Intent

This policy has been established to safeguard the integrity and credibility of *Active Swim*. In addition, it promotes public confidence in the objectivity and impartiality of activities by providing a systematic approach for individuals preparing documents and participating 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, non-financial interests are equally important. Friendship, membership in an association, society, trusteeship, and many other kinds of relationships can sometimes influence judgments and give the impression that personal motives are involved.

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

- impair the individual's objectivity
- create an unfair advantage for any person or organisation.
- working with another Swim England-approved Centre, Safety Training Awards or RLSS UK Qualifications 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.

Types of COI

- **Actual Conflict of Interest** - arises when there is a direct connection or invested personal interests – family, friendships, financial, or social factors could compromise their judgment, decisions, or actions, which may influence the performance of those duties.
- **Perceived Conflict of Interest** - A situation which a reasonable person would consider likely to compromise objectivity
- **Potential Conflict of Interest** - A situation that could develop into an actual or perceived

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
- governance of an appropriate organisation and/or awarding body that may potentially affect the assessment or integrity of the qualifications.

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

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- 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.

A completed Conflict of Interest Declaration email or form (by the workforce) will be retained confidentially and respected as far as possible. However, if this is an internal learner, the Director of Education will automatically complete this, and 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 tutor/assessor

See Appendix 1, 2 and 3 for further management of learners.

For any conflicts, please contact:

Mr H Anwary

hamid@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 a new situation occurs after completing the original declaration, a further form should be completed as required.

The person making this declaration

Name:	
Phone no:	
Email:	

Information on this declaration for potential conflict of Interest

Name:	
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 kept confidential and filed. We have respected the information provided, and it will be shared only on a need-to-know basis.

I acknowledge that the above interests exist and will inform the key contact of any changes in my circumstances.

Signed:		Date:	
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Appendix 1

The assessment process for a qualification 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. If the candidate is to be employed or part of the Active Swim workforce <u>OR</u> 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).	• To avoid COI arising, the affected individuals must declare the conflict verbally: Assessor/Verifier to <i>Active Swim</i> via the Key Centre Contact • External Verifier to the Appropriate Awarding Body (AAB), i.e. SEQ, RLSS UK Qualifications or STA. • <i>Active Swim</i> will <u>either</u> replace the affected individual with a suitably qualified person to conduct the assessment or ensure that the learner is sampled as part of the internally verified process. • The Tutor will record on the Learner Achievement Summary that <i>Active Swim</i> will record on the IV Scheduling and Monitoring document. • If the affected individual is unable to be replaced, then an additional, suitably qualified person is acquired to scrutinise the assessment outcome and; <i>Active Swim</i> to notify the AAB of the conflict, and the AAB to decide whether the affected course is to be externally verified • Internal staff members will be internally verified to ensure the impartiality of the assessment process.	
A Swim England or STA tutor who is working with another Approved Centre within a 10-mile radius and a month's time scale on either side of ACTIVE SWIM courses	• To avoid COI arising, the affected Approved Centre must declare the COI in writing and verbally to <i>Active Swim</i> and tutors, trainers/assessors • <i>Active Swim</i> will be replaced with a suitably qualified person to tutor and/or assess the course • <i>Active Swim</i> will notify the AAB of conflict, as too many courses in one area may harm the awarding body courses being run.	

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Appendix 2: COI Workforce Declaration

Annual Workforce Declaration

Name of Tutor, trainer/assessor:	
Email:	
Date:	

Do you have any perceived conflicts of interest? Yes / NO *

If so, please list below.

Professional	
Personal	
Other (including governance)	

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Appendix 3: Adopted COI Categories

SEQ Category Ref	Category	Description Examples (Applicable to SEQ, ATC/Educator or Learner)
1	Personal relations	An individual who has a close personal or familial relationship with a student or a person connected to the learner, within the delivery and / or assessment of a qualification
2	Grading	An Educator / Verifier / invigilator / examiner showing favouritism towards learners (bias), potentially leading to unfair assessment decision practice (internal or external assessment).
3	Gifting	An individual who has a vested interest in the achievement/awarding of the qualification with particular learner(s) on a course, for the purpose of obtaining incentive (Gift) of successful outcome
4	Governance / Committee	An individual who has the potential able to gain an unfair advantage within particular contexts as result of their status / position. Examples (not exhaustive) could include; a) An external governance / committee member who advises or sits on committees or board groups at other educational institutions. b) A governance / committee member who has an outside interest in an item on the agenda. c) A governance / committee member is in a position to judge research material (some of which is in their particular research area) that could be put forward with the potential to gain financially upon its outcome.
5	Recruitment	A staff member (or individual) who would normally be involved in the selection process for a new appointment learns that a close family member is applying for a relevant role.
6	Staff Training	A staff member registered undertaking a recognised qualification and / or training run by own internal employed / contracted training provider / Centre that has the potential to affect a qualification developed by SEQ.
7	Awarding Body/Organisation	Any individual who is connected to the development, delivery or award of qualifications who has interests in any other activity which have the potential to lead that person to act contrary to their interests (bias) that could impact on its compliance
8	Approved Training Centre	Any individual who is connected to the delivery or assessment of qualifications who has interests in any other activity which have the potential to lead that person to act contrary to the intent and / or purpose of the qualification(s)