

Triton Training Limited	System of Work	PAGE ISSUE DATE REVIEW	Page 1 of 4 Five 04/01/2023 01/01/2024
TITLE: ATC Conflict of Interest Policy		APPROVED BY: Directors	

1. Objectives and Scope

The aim of Triton Training is to ensure that learners undertaking a Triton Training course, training or activity provided by Triton Training can do so honestly, fairly and with integrity, objectivity, due skill, care and diligence. Triton Training proactively manages any conflict of interest in any part of the organisation. Triton Training acknowledges that conflicts of interest can be direct and obvious or indirect and perceived. Therefore Triton Training seeks to put measures in place to ensure propriety is assured at all times.

This policy has been established to safeguard the integrity and credibility of Triton Training courses and in addition, it aims to promote public confidence in the objectivity and impartiality of all Triton Training activities.

This 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 Triton Training.
- Provide the means to identify and resolve COI.
- This policy applies to all Triton Training staff and other individuals that interact or potentially interact with the Triton Training.

2. ATC Preparation

The Triton Training directors will ensure that staff, educators, assessors, internal verifiers, and anyone involved in the delivery of the qualification are all familiar with this Conflicts of Interest Policy.

3. Definition of conflict of interest

A COI is a situation in which an individual, in a position of trust, has direct or indirect, professional or personal interests or loyalties. This includes financial interest, however those interests that are not financial are just as important. Friendship, membership of an association and many other kinds of relationships can sometimes influence judgments and give an impression that personal motives are involved. Therefore such competing interests could make it difficult for individuals to fulfil their duties as it may:

- Impair objectivity, or
- Create an unfair advantage for any person or organisation, or

- Place the organisation credibility at risk.

4. 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 Triton Training, its courses and activities, attention should be drawn to it. Any individual who considers there may be an actual, potential or perceived COI must follow section 4 of the Triton Training conflict of interest policy to report the COI.

Examples include. Where someone:

- Has a known relationship of any kind between the learner/tutor/assessor/internal verifier that may have an effect on the outcome of a course or activity delivered by Triton Training.
- Has an interest in the outcome of a course or activity delivered by Triton Training.

Before registering learners with the relevant awarding body, Triton Training will:

- Establish whether the learner is known to the educators, assessors, internal verifiers, the Key Centre Contact or anyone involved in the delivery of the qualification.
- Examine any possible adverse effects that a potential COI could have now or in the foreseeable future.

5. Managing Conflicts of Interest

- If there are no potential conflicts of interest, there is no requirement for action
- Where a COI has had an adverse effect, Triton Training will take all reasonable steps to mitigate the adverse effect as far as possible and correct it
- Triton Training Directors will make the Internal Verifier aware of any COI
- Notification of a COI will also need to be submitted as part of External Verification sample and included in Centre Reviews.

Interests in assessment

Triton Training will take all reasonable steps to avoid any part of the assessment of a Learner being undertaken by any person who has a personal interest in the result of the assessment.

Mitigating measures may include, but not limited to the following actions.

- The learner's assessment to be part of the internal verification sample.
- Appointing an alternative Tutor to carry out the practical assessment aspects of the course and mark the written work.

Where, having taken all such reasonable steps, an assessment by such a person cannot be avoided, Triton Training will make arrangements for the relevant part of the learner's assessment to be subject to scrutiny by another person, e.g., the Internal Verifier.

The written conflict of interest policy

Evidence collected through the COI policy and procedure needs to be recorded, monitored, reviewed and assessed using the same quality assurance procedures that Triton Training use for all other policy reviews.

Triton Training will ensure records of mitigations in relation to Conflicts of Interest are kept and are available for examination by the relevant awarding body if requested.

6. Reporting Conflict of Interest

The COI must be declared, where possible, prior to engaging in any Triton Training activity. If a COI is not known prior to engaging with any Triton Training activity, then the person who may have the COI must withdraw from the activity and seek clarification from Triton Training Directors. If the COI is because of a change of circumstances, this will need to be reported to the Triton Training Directors. Triton Training Directors will review all declarations of COI and inform those involved of the decision in a timely manner.

- The specific details of the conflict of interest are brought to the attention of The Triton Training directors by email and by the person who wishes to report this, which could be the person directly involved, such as a tutor assessing a learner who is known to them. Details of this should be sent to info@tritontraining.co.uk.
- Specific details should include the nature of the conflict and any other key information.
- The Triton Training Directors will identify an investigating officer who will consider the details of the potential conflict of interest and any appropriate interventions.
- The outcomes of this will be recorded and placed on file including the interventions and impact of these. The person reporting the potential conflict of interest will be informed of the outcome as soon as possible though may not be told specific details as a result of confidentiality.
- If the conflict of interest is noted after the event and a conflict has potentially compromised the security of certification, then the relevant awarding body will be informed using the Triton Training conflict of interest declaration.

7. Updates of Procedure

Issue	Written, Checked and Approved	Issue Date	Action by
1	Written, Checked and Approved	09/05/2019	Krystal Buckley
2	Written, Checked and Approved	01/01/2020	Krystal Buckley
3	Written, Checked and Approved	01/01/2021	Krystal Buckley
4	Written, Checked and Approved	28/04/2022	Krystal Buckley
5	Written, Checked and Approved	04/01/2023	Krystal Buckley

8. Internal Documents & Forms

1. Triton Training Conflict of Interest Declaration

9. Sources of Information

1. RLSS Guidance Documents.
2. Swim England Qualifications Guidance Documents.
3. STA Guidance Documents.

