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Conflict of interest policy

The South West Roofing Training Group Conflict of Interest Policy refers to any case where an employee's personal interest or those of the learner might contradict the interest of the company they work for – this is to ensure the name, reputation and integrity of the learner, and official SWRTG representatives are not compromised and that no person involved in the training process should gain, or appear to gain, from any personal interest, relationship, or affiliation that conflicts with the best interests of a Learner or the SWRTG

1.Scope

All activity carried out by the South West Roofing Training Group (SWRTG) as a CITB's Approved Training Organisation (ATO) and approved centres (Melksham and Exeter).

2. Introduction

SWRTG works with a number of Approved Training Organisations (ATOs), training centres, training providers, CITB members and their employees and has links with other bodies. It is possible that these links may give rise to potential conflicts of interest. The SWRTG is therefore prepared through this policy to detail how conflicts of interest will be managed and reported by the SWRTG to the CITB.

3. Definition

It is not possible to provide a comprehensive definition of the kind of circumstances which will give rise to a conflict of interest, but the following is an example of the most likely situations that will lead to perceived conflicts of interest. In any situation where an employee is uncertain as to the propriety of a given arrangement, advice should be sought from the Chair of the committee.

Learner

A Learner being approved for training despite evidence that indicates the Learner has inadequate competence skills.

The delaying of an award achievement because the assessment period has been unnecessarily extended in order to charge for additional site visits.

The coercion of an employee or Learner by an employer, Assessor or Internal Quality Assurer (IQA) to participate in the training process in order to gain a benefit.

Family member or personal friends being registered for training.

Trainers, Assessors and Internal Verifiers (IQAs) holding an interest in an organization that competes with the SWRTG.

Use of Group documentation or information for personal gain or advantage.

Staff

A conflict between an official SWRTG representative and any other interests the particular individual may have: for example, where the individual may be in a position to influence SWRTG business for actual or potential personal benefit, or for that of a close family member, to seek such benefits at the expense of SWRTG.

Conflicts of interest are not restricted to cases in which an individual actually derives some advantage. They also arise and can be equally damaging where a conflict exists or appears to exist without any consequential behavioural impact.

SWRTG policy on conflicts of interest does not imply any lack of trust in its staff. Moreover, it is designed to protect them against criticism by ensuring that they recognise and disclose such conflict situations and take steps to avoid and/or manage the situations as they arise.

4. Disclosure and review

The following outlines the responsibilities of the parties involved in resolving the conflict(s).

It is the responsibility of the trainer, Assessors or IQAs to report promptly any actual or potential conflict that may exist between them and any Learner or between them and the SWRTG.

All persons involved in the training process must sign and date a declaration to prove they have read and understood this policy and to acknowledge the requirement to declare conflicts of interests. (This policy will form part of the induction process for all new Assessors and IQAs).

Where a potential or actual conflict of interest has been identified the Chair of Group will be responsible for ensuring that the conflict is documented and managed. If the parties involved cannot agree a suitable action plan the conflict will be referred to the Group Chairman who will have the authority to impose an action plan. The record of disclosure shall cover:

- the type of potential conflict;
- the nature of the activity;
- a description of all parties involved;
- the potential financial interests and rewards; and
- any other information which the employee feels necessary to evaluate the disclosure.

After appropriate evaluation, it may be determined that a proposed or ongoing agreement and the employee's personal interests show no conflict or apparent conflict and are acceptable without further review.

Conversely, it may be determined that some questions of propriety requiring a higher level of review have been identified. For each situation, the conflict register must be completed to demonstrate due diligence has been exercised and the conflict managed. Any agreed actions can then be monitored and be recorded for audit purposes.

