



IMS Policy Statements

ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018

TRAINING CONFLICT OF INTEREST POLICY

1. Purpose

- 1.1 The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise as a result of Seaton Rail's (SRL) role as a training provider, assessor and internal verifier of accredited and non-accredited qualifications. This policy applies to all staff and other individuals whenever they interact or potentially interact with any of SRL's training and assessment functions.
- 1.2 This policy outlines the principles and procedures for managing conflicts of interest within SRL.
- 1.3 It is the responsibility of each individual to recognise situations in which they have a conflict of interest, or might reasonably be seen by others to have a conflict; to disclose this conflict and to take such further steps as may be appropriate and set out in more detail under the procedure below.

2. Definition

- 2.1 A conflict of interest may generally be defined as a conflict between the official responsibilities of a tutor, assessor, and internal verifier and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions.
- 2.2 Conflicts of interest can arise in a variety of circumstances for example:
- When an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation
 - When an individual has personal interests that conflict with his/her professional position
 - Where someone works for or carries out work on SRL's behalf, who has friends or relatives taking SRL's training courses/assessments
 - A person who is connected to the development, delivery or award of qualifications by the organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award.

3. Examples of Conflict of Interest

- 3.1 It is not possible to provide a definitive list of examples of conflicts of interests, but the following are examples of situations that could lead to actual or perceived conflicts of interest:
- Tutors, assessors and internal verifiers working with a business outside of SRL that is in direct competition with them
 - Tutors and assessors participating in the appointment, promotion, supervision or evaluation of a person with whom the person, has close or familial ties
 - Tutors and assessors having a close or familial relationship with a SRL registered learner, or learners' family whilst being involved in decisions about the outcome of their qualification/competence
- 3.2 The existence of such interests as those outlined above, does not necessarily imply a conflict, but is likely to give an appearance of conflict and as such should be declared to SRL.

| <i>Integrated Management System Policy Statements</i> | | <i>Training: Conflict of Interest Policy Statement</i> | |
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4. Process of reporting a conflict of interest

4.1 It is the duty of all tutors and assessors to disclose any actual or potential conflict of interest, and the process for doing this is as detailed below:

- All tutors, assessors and internal verifiers are issued with a conflict of interest form to complete on commencement with the organisation. It is a requirement that this is completed and updated accordingly
- The information held on the conflict of interest form is then transferred to a register of interests document which is maintained by a designated person within SRL
- If the individual concerned has any changes to their declared circumstances, they must inform the training and development manager immediately in writing, so that the conflict of interest can be evaluated and the register updated
- The form is to be completed even when the individual has no conflict of interest to declare
- The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept

5. Action

5.1 Most situations require no further action than the completion of the conflict of interest form. In some instances, however, the information declared on the form will require some follow up action, in order for the conflict of interest to be managed appropriately. The approach agreed between the training and development manager and the tutor, assessor or internal verifier will be documented, updated on the register and held with the conflict of interest forms.

This policy will be reviewed annually and updated as necessary.

Reviewed by:

A handwritten signature in black ink, appearing to read 'shane seaton', is written over a large, diagonal watermark that says 'UNCONTROLLED WHEN PRINTED'.

Shane Seaton

Managing Director

Date: 9th January 2023

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