

# Conflict of Interest Policy

## 1. Definition

- 1.1 A conflict of interest is a situation in which an individual has competing interests or loyalties which could compromise or be seen to compromise their decisions. This includes all Nuco Team Members, Registered Trainer/Assessors (T/A's), Sub-Contractors, etc.

## 2. Policy Statement

- 2.1 Nuco Training Ltd (Nuco) shall at all times be aware of issues or actions that are, or may be considered to be, conflicts of interest.
- 2.2 Nuco will take all reasonable steps to ensure that no conflict of interest has an adverse effect.
- 2.3 Nuco will mitigate potential conflict of interest through:
- a) Having a robust application and vetting procedure for T/A Registration.
  - b) Adopting the Assessment Principles for regulated first aid qualifications regarding the qualifications required for personnel involved in training and assessment processes.
  - c) Providing clear guidance to registered T/A's on the conduct of assessment, clarifying the process for Learners, setting the right environment, considering reasonable adjustments and providing the correct answers to ensure consistency.
  - d) Making freely available detailed course session plans.
  - e) Providing standard scenarios for practical assessments, where appropriate, to ensure T/A's follow a pre-established programme linked to course plans and outcomes and ensure consistent marking.
  - f) Providing a standard assessment process relating to the Learning outcomes and Assessment criteria for any given qualification.
  - g) Providing a clear Learner registration process that Learners complete at the commencement of the course. The form provides a list of learning outcomes that the Learner can track throughout the course. This helps to ensure the course covers all Learning outcomes and Assessment criteria, and that the T/A's cannot 'cut corners'.
  - h) Providing course evaluation forms that are completed by Learners at the end of each course. These include a section concerned with the assessment process asking if they felt the assessment process was clearly explained, fair, relevant and unbiased.
  - i) Requiring the T/A to participate in internal quality assurance of assessments and course paperwork from both established T/A's and new T/A's.
  - j) Examining sample completed assessment papers. Nuco selects at random a number of courses assessed by T/A's in qualification groups. In returning such material, T/A's are asked for feedback on the assessment process. This process is designed primarily at ensuring that our assessment papers are fit for purpose. Outcomes are recorded and any indications of maladministration or conflict of interest issues identified would be examined further and this may include a quality assurance visit to the T/A.
  - k) Examining completed course paperwork in respect of courses selected by Nuco where T/A's have posted results on-line. This not only examines the whole administration process but includes the assessment process.
  - l) Annual monitoring of T/A's to include the monitoring of both the training and the assessment process. The monitor must be suitably qualified and have had no involvement in the delivery of the course being monitored.

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- 2.4 Where such a conflict of interest has had an Adverse Effect, Nuco will take all reasonable steps to mitigate the adverse effect as far as possible and correct it.
- 2.5 Nuco will require its Registered T/A's to adopt this policy and will make this policy readily available to all.
- 2.6 Nuco will amend this policy if required to do so by any Regulatory Body.

## 3. Possible conflicts of interest

- 3.1 The list below are examples of actions that may be seen as posing a conflict of interest with action that may be taken to avoid an adverse effect arising:
  - a) Assessments - Assessments, or any part of the assessment process (including by way of Moderation), of Learners should not be undertaken by a person who has a personal interest (personal benefit or gain) in the result of the assessment. Where, having taken all such reasonable steps, an assessment by such a person cannot be avoided, Nuco will make arrangements for the relevant part of the assessment to be subject to scrutiny by another suitably qualified person.
  - b) Fees - Nuco will apply fees and charges according to its written policy/schedule of prices equally to all registered T/A's. Any discounts or variations applied will be supported by criteria that will also be applied equally to all T/A's.
  - c) T/A's Registration - All applicants for T/A approval will be required to meet a standard set of criteria as detailed by the appropriate Regulatory Body.
  - d) Quality Assurance - All T/A's will be subject to Nuco's established policies and conditions relating to quality assurance.
  - e) Nuco relations with registered T/A's - Nuco will take all reasonable steps to ensure that Nuco registered T/A's are not treated more or less favourably.

The list above is not exhaustive or exclusive.

## 4. Management of possible conflict of interest

- 4.1 Where a possible conflict of interest is identified, Nuco will:
  - 1) In consultation with all parties concerned, gather the facts relating to the possible conflict of interest.
  - 2) Consider the possible consequences and, in particular, consider whether an adverse effect may arise.
  - 3) Consider what action may be taken to avoid the conflict of interest or avoid an adverse effect arising. Nuco may consult the appropriate regulatory body where there is any doubt that local action may be insufficient.
  - 4) Nuco will monitor the effects of action taken.
  - 5) Nuco will maintain a record of such events and consider action that may be taken to avoid such events happening again.
- 4.2 Where a conflict of interest has arisen that has caused an adverse effect, Nuco will deal with it in accordance with the relevant policy as appropriate.

## 5. Record of conflict of interest issues

- 5.1 Where a possible conflict of interest is identified and action taken, Nuco will retain a record that will be available for audit and used to develop and evolve its policies and procedures.

## 6. Policy review

- 6.1 Nuco will review this policy periodically and revise it as necessary in response to customer and candidate feedback, changes in FAA policies and practices, actions from the regulatory authorities or external agencies or changes in legislation. Nuco welcome feedback or views of interested parties to ensure the policy is fit for purpose. If you would like to feedback any views, or if you have any questions concerning this policy, please contact Nuco via the details provided at the end of this policy.

## 7. How to contact us

- 7.1 How to contact Nuco Training Ltd

**Post:** Nuco Training Ltd, Barton House, Central Treviscoe, St Austell, Cornwall PL26 7QP  
**e-mail:** enquiries@nucotraining.com  
**Telephone:** 03456 444999