

Instructor Disclosure of Interests Policy

Purpose

To ensure transparency, integrity, and impartiality in all training programs, this policy requires instructors to disclose any financial or personal interests in products, instruments, devices, or materials that may be included in training sessions.

Scope

This policy applies to:

- All instructors employed directly by the training provider.
- All independent contractors engaged to deliver training on behalf of the provider.

Policy Statement

1. Mandatory Disclosure

- Instructors must disclose any financial, ownership, or other material interests they hold in products, instruments, devices, or materials that are referenced, demonstrated, or recommended during training.
- Disclosure must be made in writing to the provider prior to the commencement of training.

2. Timing of Disclosure

- Initial disclosure must be submitted at the time of contracting or employment.
- Updates must be provided whenever new interests arise or existing interests change.
- Instructors must also verbally disclose relevant interests to participants at the beginning of each training session where such products or materials are used.

3. Types of Interests Covered

- Direct financial interests (e.g., ownership, shares, royalties).
- Indirect financial interests (e.g., consulting fees, paid endorsements).
- Non-financial interests (e.g., advisory roles, affiliations).

4. Provider Responsibilities

- The CE/T Compliance officer of the provider will maintain a record of all disclosures.
- The CE/T Compliance officer of the provider will review disclosures to identify potential conflicts of interest.
- Where a conflict is identified, the CE/T Compliance officer of the provider will require mitigation measures in the form of disclaimers and signed contracts ensuring balanced presentation of alternatives. The provider reserves the right to withhold pay until such contracts and disclaimers are provided.

5. Non-Compliance

- Failure to disclose relevant interests will result in disciplinary action, up to and including termination of employment or contract, and/or withholding of pay.

Acknowledgement

All instructors must sign an acknowledgement form confirming they have read, understood, and agree to comply with this policy.