



# CONFLICT OF INTEREST POLICY



<b>Name of Author</b>	<b>Chief Executive Officer</b>
<b>Approved by</b>	<b>Board of Directors</b>
<b>Approval dates</b>	<b>18 March 2013 (version 1)</b> <b>16 September 2015 (version 2)</b> <b>October 2017 (version 3)</b>
<b>Review Date</b>	<b>March 2019</b>

**Policy Applies to:** all persons involved with the business operations, national teams and decisions of the Company involving key volunteers.



## 1. Policy Statement

It is Hockey Wales' policy that

**“Directors, committee members, key volunteers, employees, consultants and others acting on behalf of Hockey Wales must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting Hockey Wales business activities.”**

Hockey Wales is committed to maintaining the highest standards of corporate governance and conducts its business in an open and transparent manner. The aim of this policy and process is to protect both Hockey Wales and the individuals concerned from any appearance of improper behaviour. Everyone identified within this policy documentation should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism. They should avoid situations where they, or Hockey Wales, could be open to suspicion of dishonesty and not put themselves in a position of conflict between their official duty and private interest.

Hockey Wales accepts that people may take part in legitimate financial, business, charitable and other activities outside their Hockey Wales roles, but any potential conflict of interest raised by those activities must be disclosed promptly following the guidelines provided on the conflict of interest form. All employees must obtain written permission from Hockey Wales before taking on a paid or volunteer role in any other sports organisation.

This policy explains what is viewed by Hockey Wales as a conflict of interest and the procedure to follow where a conflict of interest arises. Other Hockey Wales policies may impact on this policy area and may need to be consulted when determining conflict, particularly the Hospitality and Gifts Policy and Code of Conduct. Implementation of this policy and procedure must be clear and transparent and not subject to any unfair discriminatory practices.

## 2. Scope and Definitions

This Policy applies to all of the following Hockey Wales personnel:

- Directors and sub committees of the Board;
- Regional chairs and regional committee members;
- Members of committees, working groups, task forces or similar appointed by Hockey Wales for any purpose;
- Volunteer national coaches and team management;
- Full time, part time and casual employees;
- Any person contracted to undertake work for Hockey Wales who has any other voluntary role within the organisation or its affiliated bodies

This Policy applies whenever a person identified above recognises, or should reasonably recognise, that he/she has a Conflict of Interest.

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A **Conflict of Interest** is a situation in which a person has an Interest (defined below) which may compromise that person's obligations to Hockey Wales or to any other person or body with which Hockey Wales has a relationship (e.g. GB Hockey, Sport Wales). A Conflict of Interest includes perceived and potential conflicts as well as actual conflicts of interest. A *perceived* conflict of interest is one which a reasonable person would consider likely to compromise objectivity. A *potential* conflict of interest is a situation which could develop into an actual or perceived conflict of interest.

An **Interest** is a financial or non-financial interest involving the Person, or a Connected Person (defined below). A *financial interest* refers to anything of non-trivial monetary value including but not limited to salary, commission, consultancy fees, contractual interest, discounts, property and royalties. A *non-financial interest* refers to any non-financial benefit or advantage including but not limited to access to privileged information or services, property or intellectual property rights and enhancement of a career, education or professional reputation. In a sports environment this may include training and selection of athletes and coaches.

A **Connected Person** is anyone with whom the individual in question has a relationship which is likely to appear to a reasonable person to influence the individual's objectivity including but not limited to close family, their partner and close personal friends.

**If an individual has a Conflict of Interest, they have a duty to disclose it under the procedure set out below.** In the case of a Director of Hockey Wales, disclosure is a requirement under Company Law and is clearly identified within the Company Articles of Association which take precedence over this policy. Any Director acting in any other role on behalf of Hockey Wales, at any time, shall first and foremost be considered as a Director and accordingly must adhere to the Articles of Association and this policy.

### **Information Collection Process**

The Company Secretary (or other appropriate individual the role is delegated to) shall maintain a register of those individuals who will be required on appointment and at least annually to complete and sign the Hockey Wales Conflict of Interest form. It is the responsibility of the Company Secretary to ensure that individuals on the register are provided with a Conflict of Interest form and that the completed form is received and retained by Hockey Wales. Processing of this data shall be undertaken in line with Hockey Wales data control processes, with declarations made by Directors being retained for at least 10 years and other individuals for at least 5 years. The information will be retained for the period of time from cessation of the conflict and not from the date the conflict is registered.

Regional Chairs and other Committee Chairs are required to provide every Committee Member with a copy of the Conflict of Interest form and advise the Company Secretary accordingly. The distribution of such forms is the responsibility of the Regional and Committee Chairs, the collection of the forms and data remains the responsibility of the Company Secretary.

On receipt of the completed forms the Company Secretary will update the register with the information declared by each individual

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## Managing Conflict

The Hockey Wales Conflict of Interest Panel shall consist of the Company Secretary, the Chair of the Board and one other. The panel shall be responsible for reviewing the Conflict of Interest forms and Register and advising of any action required in addition to the standard management process for any particular conflict. If a conflict can be managed the agreed management process must be clear and reported in the register.

The register information and examples of ways to manage conflict will be provided at least annually to the Chairs of all Hockey Wales Committees, Hockey Wales National Coaches, each Director and to any other person that the Conflict of Interest Panel decides requires it to fulfil their Hockey Wales responsibilities.

Conflicts of Interest can arise in various scenarios; the most likely is in a committee situation, therefore Hockey Wales has set up the following process to be followed at every meeting:-

The Chair of the meeting is required to ask those attending, (including non-committee member invited attendees) to declare any interest(s) linked to any item on the agenda. All notifications must be reported in the minutes of the meeting along with the actions taken by the Chair to manage the conflict.

If a conflict decision is challenged after the meeting all information must be referred to the Conflict of Interest Panel who will be responsible for reviewing the decision made by the Chair of the committee and providing written recommendations for any action.

Below are examples of how an individual may manage conflict themselves or how a committee Chair might manage a particular meeting situation:-

- not taking part in discussions of certain matters
  - either staying in the room or
  - vacating the room until the particular item is finished;
- not taking part in decisions relating to certain matters
  - either staying in the room when the decision is made or
  - vacating the room whilst the decision is made having stayed for the discussion;
- if the conflict relates to the Chair of the meeting, he/she must vacate the role of chair and the room, until the particular item is finished or a decision made;
- stepping aside from any involvement in a particular task;
- declaring an interest to a particular sponsor or third party (this may be following discussion with, or recommendation of, the Conflict of Interest Panel); and/or
- temporarily suspending authorised consultancy work until a decision is given by the Conflict of Interest Panel

## Conflicts That Cannot Be Managed

Situations may arise where the Conflict of Interest Panel decides it is not possible to manage the conflict, in these circumstances the panel will request a meeting with the individual concerned to discuss and agree the way forward. The register should be noted accordingly with the date of the agreement; the full details may or may not be included as determined by the agreement and level of confidentiality.

If an employee's conflict is deemed non manageable a copy in writing of the conflict, decision and signed agreement must be placed on the employee's Human Resources file. Such information shall be protected in accordance with the Data Protection Act and restricted to those who require it to fulfil their Hockey Wales responsibilities. The register should be noted accordingly with the date of the agreement; the full details may or may not be included as determined by the agreement and level of confidentiality.



## Data Protection and Publication of Declarations

The information collected for the purpose of managing conflict may in certain circumstances be deemed sensitive personal information and as such inappropriate for public circulation. Hockey Wales will take steps to identify such information with individuals as part of the data collection process and agree its exclusion from publication. This exclusion may also include details relating to conflicts that cannot be managed as noted earlier in this policy document. Requests for all declaration information, suitable for public circulation, will be made available by the Conflict of Interest Panel.

## Further Information

For further information about any aspect of Hockey Wales Conflict of Interest Policy, please contact:

Hockey Wales  
Sport Wales National Centre  
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