

# Conflict of Interest Policy



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1.0	13/04/2018	Published	Governance Director	Governance Director
2.0	30/01/2021	Revised version updated to include best practice guidance from Sport England, approved by ETA Board	Governance Director	Governance Director

## 1. Policy

To protect the integrity and credibility of the ETA, all individuals with significant influence over decisions must transparently declare actual or perceived conflicts of interest. These individuals will strive to avoid any conflict of interest between the interests of the ETA and their personal, professional and/or business interests. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

## 2. Scope

All Directors, employees or senior volunteers within the ETA are considered to have significant influence over decisions and are therefore subject to this policy.

A COI is a situation in which an individual, in a position of trust, has a direct or indirect, competing interest. This will include financial, a relative, membership or posts held at other organisations, which can sometimes influence judgements and give an impression that other motives are involved. Therefore, such competing interests can make it difficult for individuals to fulfil their duties because it could:

- Impair the individual's objectivity or
- Create an unfair advantage for any individual or organisation.

The appearance of a COI can be just as detrimental as the existence of a real conflict. An apparent COI arises when a reasonable person, with knowledge of the relevant facts, would question the impartiality of the individual in the matter being considered.

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## 3. Objectives and procedures

The ETA will:

- a) Identify and record all Conflicts of Interest:

Upon appointment each Director, staff member or senior volunteer will make a full, written disclosure of interests by completing the *Conflict of Interest Declaration Form*. This written disclosure will be kept on file and will be updated annually or as appropriate.

In the course of development or delivery of ETA meetings or activities, Directors, staff members or senior volunteers will disclose any interests in a transaction or decision where there may be a conflict between the ETAs' best interests and the Individual's best interests or a conflict between the best interests of two organisations that the Individual is involved with. If in doubt the potential conflict must be declared anyway and clarification sought. These must be recorded in meeting minutes or other records.

If in doubt, an interest should be declared and the responsibility for declaring interests (actual or perceived) rests with the Individual.

- b) Actively manage all Conflicts of Interest:

In the case of a conflict of interests arising because of a duty of loyalty owed to another organisation or individual and the conflict is not authorised by virtue of any other provision in the ETA Articles of Association, the unconflicted Directors, staff members or senior volunteers (as appropriate) may authorise such a conflict of interests where the following conditions apply:

- the Director, staff member or senior volunteer who has declared the conflict of interest withdraws from the part of the meeting/activity at which there is discussion of any arrangement or transaction affecting that other organisation or individual;
- the Director, staff member or senior volunteer who has the conflict of interest does not vote/contribute to decision making on any such matter and is not to be counted when considering whether a quorum is present at the meeting;
- the other Directors, staff members or senior volunteers who have no conflict of interest in this matter consider it is in the interests of the ETA to authorise the conflict of interest in the circumstances applying.

Any such disclosure and the subsequent actions taken will be noted in the minutes.

## 4. Monitoring & Evaluation

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This policy will be reviewed as part of the England Touch Association policy review schedule approved (not less than once every three years).

The England Touch Association will regularly monitor and evaluate the policies, procedures and practices and inform stakeholders and partners of their impact and of any resulting recommendations.

