



## **CONFLICT OF INTEREST POLICY**

### **1 INTRODUCTION**

- 1.1 This document explains Gymnastics Northern Ireland's "Conflict of Interest Policy" and the steps that must be taken when an interest is declared or discovered. Each Management Committee member and employees of Gymnastics Northern Ireland (GNI) must-adhere to this policy. Any person who does not follow this policy may be subject to disciplinary action by GNI.
- 1.2 Gymnastics Northern Ireland aims to embrace a philosophy of disclosure and fosters an attitude of openness and integrity (Nolan Principles). This document explains the Gymnastics Northern Ireland "Conflict of Interest Policy" and attempts to deal with the issue in ways that are fair to Management Committee members and employees and enable the organisation to function while protecting integrity and providing unbiased advice.

### **2 DEFINITIONS**

- 2.1 The following provides a definition of words used throughout the document:

**Conflict** refers only to personal, established interest of the individuals covered by this policy and their immediate families, and not to philosophical or professional differences of opinion.

A Conflict of Interest would include, but not be limited to, direct or indirect interest of Management Committee members or employees in:

- A company, service or product that could be affected by a decision of Gymnastics Northern Ireland;
- A company or product that is in competition with a company, service or product that could be affected by a decision of Gymnastics Northern Ireland;
- Acceptance of any gift, entertainment, services, loans or promise of future benefits from any person or organisation that might benefit because of the individuals connection with Gymnastics Northern Ireland; and
- Compensation in the form of fees or salaries if such payment results directly or indirectly from the Management Committee or employee's work with Gymnastics Northern Ireland.

**Connected Person** relates to significant others that may have an influence. It may include the following:

- Parents;
- Spouse or partner;
- Children and their spouse/partner;
- Grandchildren and their spouse/partner;



- Grandparents;
- Brothers and their spouse/partner; and Sisters and their spouse/partner.

### **3 GYMNASTICS NORTHERN IRELAND POLICY**

- 3.1 It is the policy of Gymnastics Northern Ireland that no Management Committee member or employee while serving as an Officer of the Association will take personal advantage of his or her role by allowing a situation to exist that may be construed as a conflict of interest.
- 3.2 In addition, Gymnastics Northern Ireland intends to ensure with reasonable prudence that no Management Committee member or employee creates the appearance of realising financial gain of any nature or amount from GNI actions.
- 3.3 It is also the intent of Gymnastics Northern Ireland to carry out activities in accordance with the highest ethical standards. Adoption of this Policy is, therefore, a reaffirmation of GNI intent that those holding appointed leadership positions practice the highest ethical standards and give undivided loyalty to the organisation and its goals. Any activities which do not serve the best interest of Gymnastics Northern Ireland or which favour the personal advantage of another person or organisation is inconsistent with the duties and responsibilities owed to Gymnastics Northern Ireland.
- 3.4 Gymnastics Northern Ireland is committed to maintaining an honest, open and well-intentioned atmosphere within the Association. It is therefore also committed to the elimination of any fraud and to the rigorous investigation of any such cases.
- 3.5 Management Committee members and employees of Gymnastics Northern Ireland should therefore not engage in any conduct or activity that might reasonably be interpreted as tending to adversely affect the performance of their duties.

### **4 WHAT IS A RELEVANT INTEREST?**

- 4.1 An interest should be declared if an individual considers it relevant to their duties and that there is therefore a risk of it being reasonably perceived as biasing their decisions while conducting their duties. The test is whether "an external observer, knowing the facts of the situation, would reasonably think that the person might be influenced by the interest".
- 4.2 It is not possible to provide a comprehensive definition of circumstances that necessarily give rise to a conflict of interest, but the following are examples of situations giving rise to perceived conflict of interest. The list is not exhaustive, and in any situation where an individual is uncertain as to the propriety of a given arrangement, advice may be sought from the GNI Chair.



#### 4.3 General Examples

- A financial interest held by an individual (or by his or her immediate relative/s or household member/s) in an organisation. Examples of such interests are paid consultancies, paid service on a board of directors, director/shareholder in an enterprise from which Gymnastics Northern Ireland buys a service.
- Any relationship with a named organisation with which Gymnastics Northern Ireland might do business. Such interests would include: ownership, part-ownership, directorship, shareholder etc.

4.4 Individuals are not expected to quantify the extent of a financial interest, merely the fact that one exists. The presumption is always in favour of declaring an interest.

### 5 REGISTERING AN INTEREST

5.1 The aim of the register is to identify those activities and interests, which individuals consider as carrying a risk of bias in the conduct of their duties. The following process is therefore carried out in order to manage conflicts of interest:

#### 5.2 Initial Registration

5.2.1 On joining Gymnastics Northern Ireland the following individuals are required to complete a declaration of interest form (Annex A) and submit the original to the Business Development Manager:

- Management Committee member
- Staff Member (full or part time)

5.2.2 Forms will be circulated and must be completed on an annual basis. In addition, as circumstances change, individuals must update their statements by informing the Business Development Manager within 28 days of becoming aware of the change.

#### 5.3 Annual Registration

5.3.1 Individuals will be required to complete declaration of interest of interest forms on an annual basis. This should take place after the AGM or whenever the individual takes office.

#### 5.4 Limitations on Involvement at Meetings

5.4.1 The Chair of the meeting will be identified as a facilitator for conflict issues. It shall be his or her responsibility for conducting the process detailed below. The Secretary or Business Development Manager will be identified as the alternate facilitator to act when the facilitator is unavailable or in a position of conflict his or her self.

5.4.2 At the beginning of every meeting, the facilitator will ask whether any



individuals present perceive a possible conflict of interest on any of the agenda items for themselves or for any other individuals.

- 5.4.3 The facilitator will use his or her judgement and decide if the declaration actually constitutes an interest in the planned business of the meeting.
- 5.4.4 If viewed by the facilitator that a conflict exists, the individual will be precluded from participation in any discussion of the issue (whether oral or written) and in decision-making. The individual will be excluded from the portion of the meeting for which there is conflict by being asked to leave the meeting when the item may then be discussed.
- 5.4.5 The facilitator should ensure all details of conflict raised are recorded in the minutes of the meeting.

## **6 ANNUAL REGISTRATION**

- 6.1 All employees/Management Committee members must update their declarations on an annual basis via the attached form mentioned in 5.2.
- 6.2 Once completed all forms must be recorded on the register of interests by the Treasurer, or Business Development Manager on behalf of the Treasurer.
- 6.3 The Treasurer or Business Development Manager on behalf of the Treasurer will maintain a database of interests and provide a referral service in relation to Management Committee members and employees.

**Adopted by the GNI Management Committee on (date):**\_\_\_\_\_

**Signed:**\_\_\_\_\_ **Chair**

\_\_\_\_\_ **Witness**



## Declaration of Interests Form

### Section A

This form is to be completed by all Management Committee members and employees of Gymnastics Northern Ireland and returned to the Business Development Manager. Where no interests are to be disclosed, please state 'Not applicable'.

**Full Name:** \_\_\_\_\_ **Position Held:** \_\_\_\_\_

***This section relates solely to interests of the above named person. For their partners or close relatives, where the interest is deemed to be relevant, please complete Section B below.***

1. Please give details of any positions held outside GNI, whether paid or unpaid, in any public, private or sporting/community/voluntary sector organization (s).

2. Do you receive any payment or reward from the organisation(s)? If so, please give details.



3. In light of the principles set out in the GNI Conflict of Interests Policy, please give details of any other interests in or personal relationships with outside bodies or individuals which might, to your knowledge, conflict with the work of GNI.

4. Are you aware of any links (direct or indirect) between the activities of the organisation(s) or interests held and the work of GNI? If so, please give details.

**Please continue to Section B and Section C**



**Section B**

*This Section relates solely to interests of the partner/spouse or relative of the named person in Section A*

**Full Name:** \_\_\_\_\_

**Relationship to above person:** \_\_\_\_\_

**Employment Details**

	<b>Name of Employer</b>	<b>Nature of Business</b>	<b>Position Held</b>
Details of employment/self-employment, paid or unpaid held which may be significant to, or relevant to, or bear upon the activities of Gymnastics Northern Ireland.			



## Section C

### DECLARATION

I declare that, to the best of my knowledge and belief, the information I have given in this form is truthful, accurate and complete.

I undertake to notify Gymnastics Northern Ireland in writing of any changes to this information within 28 days of any such change.

I undertake to ensure that, subject to approval of this Declaration, the interests that I have disclosed will not detrimentally affect my ability to carry out my duties as a Gymnastics Northern Ireland Management Committee member/employee.

In making this declaration I consent to the information contained in it being available for inspection in the Register of Interests for Gymnastics Northern Ireland.

**Print Name:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Please return to:** GNI Business Development Manager

**Office use only:**

**Form received date:** \_\_\_\_\_

**Register updated:** Y / N

**Review due date:** \_\_\_\_\_

**Signed:** \_\_\_\_\_