

## **HEMINGFORDS LAWN TENNIS CLUB**

### **CONFLICT OF INTEREST POLICY**

Reviewed and agreed by the Hemingfords Lawn Tennis Club (HLTC) Committee, February 2024.

#### **Policy Statement**

HLTC is committed to maintaining high standards and conducts its activities in an open and transparent manner. The aim of this policy and process is to protect both HLTC and committee members concerned from any appearance of improper behaviour or wrong doing. Even the appearance or suggestion of a conflict of interest can damage the reputation of HLTC.

Conflicts of interests may arise where an individual's personal, family or business interests and/or loyalties conflict with the objectives of HLTC.

Such conflicts may create problems and can:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of the HLTC; and
- Risk the impression that the Committee has acted improperly.

HLTC accepts that people may take part in legitimate financial, business, charitable and other activities outside their HLTC roles, but any potential conflict of interest raised by those activities should be disclosed promptly.

This policy explains what is viewed by HLTC as a conflict of interest and the procedure to follow where a conflict of interest arises.

This Policy applies whenever a committee member of HLTC recognises, or should reasonably recognise, that he/she has a Conflict of Interest. A Conflict of Interest is a situation in which a person has an Interest (defined below) which may compromise that person's obligations to HLTC or to any other person or body with which HLTC has a relationship (e.g. Local Authority, Sport England, a sponsor).

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, selection of a player/team or similar.

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 are expected to disclose it under the procedure set out below.

#### The declaration of interests

All club committee members must declare their interests in connection with their role in HLTC. A declaration of interests form is provided by HLTC for this purpose (see below).

It is the responsibility of the Club Secretary to ensure that individuals elected to the committee are provided with a declaration of interests form and that the completed form is received, reviewed and retained by the Club.

The declaration of interests needs to be revised or updated at least annually and also immediately if any changes occur. If anyone is not sure what to declare, or whether/when their declaration needs to be updated, please err on the side of caution. If anyone would like to discuss their concerns, they should contact the Club Chairperson for confidential guidance.

Completed Declaration of Interest forms collectively make up HLTC's Register of Interests, which will be maintained by the Secretary. The register will be accessible by the Club Chair and Secretary only.

Where it is subsequently discovered that one or more persons involved in a decision had not declared their conflict of interest to the meeting or equivalent, the Chair will decide whether the matter needs to be reconsidered and may so direct.

#### Data Protection

The information provided will be processed only to ensure that the best interests of HLTC are maintained. The information provided will not be used for any other purpose.

#### Managing Conflict

The Secretary and the Chair shall be responsible for reviewing the declaration of interest forms and advising on any action required to manage any particular conflict. Conflict of Interest can arise in various ways; the most likely is in a meeting situation, therefore HLTC has set up the following process to be followed:

At every meeting:

The Chair of the meeting is required to ask those attending to declare any interest(s) linked to any item on the agenda. All notifications (including "none") must be reported in the minutes of the meeting along with the actions taken by the Chair to manage the conflict.

#### What to do if you face a conflict of interest

You should declare your interest at the earliest opportunity.

Below are examples of how an individual may manage conflict themselves or how a 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 until the decision is made having stayed for the discussion;
- if the conflict relates to the Chair of the meeting, he/she must vacate the chair and the room until the particular item is finished;
- stepping aside from any involvement in a particular task or selection decision;
- declaring an interest linked to a particular sponsor or third party.

#### Conflicts That Cannot Be Managed

Situations may arise where the Chair decides it is not possible to manage the conflict, in these circumstances the Chair will request a meeting with the individual concerned to discuss and agree the way forward. The minutes of the meeting 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.

Note: The Conflict of Interest Policy and Procedures should be regularly reviewed, at a maximum interval of 3 years.

Declaration of Interest

Name: \_\_\_\_\_

I hereby declare an interest as set out below and undertake to abide by Hemingfords Lawn Tennis Club policy on such matters and to comply in any decisions of the Chair with regard to the management of my conflict(s).

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

Dated: \_\_\_\_\_

Nature of Interest(s)

Notes

A Conflict of Interest is a situation in which a person has an Interest (defined below) which may compromise that person's obligations to HLTC or to any other person or body with which HLTC has a relationship. 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.

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.

Interest: Financial Non-Financial

Self:

Connected

Person:

Name(s)