

# **Surf Life Saving Wales**



## **Association Conflict of Interest Policy**

Registered CIO 8th July 2014  
Registration Number 1157762  
Updated AGM 21<sup>st</sup> March 2021

## Policy Statement

It is the CIO's policy that:

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

SLSA Wales is committed to maintaining the highest standards of corporate governance and conducts its activities in an open and transparent manner. The aim of this policy and process is to protect both SLSA 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 SLSA Wales, could be open to suspicion of dishonesty and not put themselves in a position of conflict between their official duty and private interest.

SLSA Wales accepts that people may take part in legitimate financial, business, charitable and other activities outside their SLSA Wales roles, but any potential conflict of interest raised by those activities must be disclosed promptly following the guidelines provided on the declaration of interest form.

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

## Scope and Definitions

Please read this policy along with the relevant section in the CIO constitution. This Policy applies to all of the following SLSA Wales personnel:

- Trustees and commission members;
- members of sub-committees, working groups, task forces or similar appointed by SLSA Wales for any purpose;
- volunteer national coaches and team management
- full time, part time and casual employees;
- any person contracted to undertake work for SLSA Wales who has any other voluntary role within the CIO 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.

A **Conflict of Interest** is a situation in which a person has an interest (defined below) which may compromise that person's obligations to SLSA Wales or to any other person or body with which SLSA Wales has a relationship (e.g. RLSS, Surf Life Saving GB, 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 trustee of the CIO disclosure is a requirement and is clearly identified within the constitution which take precedence over this policy. Any trustee acting in any other role on behalf of SLSA Wales, at any time, shall first and foremost be considered as a trustee and accordingly must adhere to the constitution and this policy.

### **Information Collection Process**

The General Secretary shall maintain a register of those individuals who will be required on appointment and at least annually to complete and sign the SLSA Wales declaration of interests form. It is the responsibility of the General Secretary to ensure that individuals on the register are provided with a declaration of interests form and that the completed form is received and retained by SLSA Wales. Processing of this data shall be undertaken in line with SLSA Wales data control processes, with declarations made being retained for at least 5 years.

Commission chairs (and other sub-committee chairs) are required to provide every commission member with a copy of the declaration of interest form and advise the General Secretary accordingly. The distribution of such forms is the responsibility of the commission chairs the collection of the forms and data remains the responsibility of the General Secretary.

On receipt of the completed forms the General Secretary will update the register with the information declared by each individual using the categories of:-

<b>Interest:</b>	Financial	Non-Financial	Perceived	Potential
Self:				
Connected Person:				

## Managing Conflict

SLSA Wales Conflict of Interest Panel shall consist of the Secretary, the Chair and the President. The panel shall be responsible for reviewing the declaration of interest forms and register and advising on any action required in addition to the standard management process for any particular conflict. If a conflict can be managed the management process must clear and reported in the register.

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

Conflict of Interest can arise in various scenarios; the most likely is in a committee situation, therefore SLSA 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.

## 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. SLSA Wales will take steps to identify such information with individuals as part of the data collection process and agree its exclusion from publication. All other declaration information will be made publicly available on the SLSA Wales website in the form of a statement of annual declarations which will be issued by the Conflict of Interest Panel.

<b>Policy information</b>		
<b>Organisation</b>	<b>SLSA Wales</b>	<b>Additional notes</b>
<b>Scope of policy</b>	This policy as adopted applies to all persons involved with the business operations, national teams and decisions of the CIO.	
<b>Policy operational date</b>	First Draft circulation August 2013	Add policy to website
<b>Date approved/ reviewed by the Trustees</b>	21 <sup>st</sup> March 2021	Circulation prior to meeting, Trustees to return comments to Secretary to be adopted immediately following approval.
<b>Policy review date</b>	Every 3 <sup>rd</sup> year following its approval date or sooner if required	