

# **CONFLICT OF INTEREST POLICY**

## **1. Introduction**

This document explains the Ulster Gliding Club ‘Conflict of Interest Policy’ and the steps that must be taken when an interest is declared or discovered. Each Director, each member of the Management Committee and each employee of the Ulster Gliding Club must adhere to this policy. Any person who does not follow this policy may be subject to disciplinary action by the Ulster Gliding Club.

The Ulster Gliding Club aims to embrace a philosophy of disclosure and fosters an attitude of openness and integrity (Nolan Principles). This document explains the Ulster Gliding Club ‘Conflict of Interest Policy’ and attempts to deal with the issue in ways that are fair to Directors, members of the Management Committee and employees and to enable the organisation to function while protecting integrity and providing unbiased advice.

## **2. Definitions**

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 Directors, members of the Management Committee and employees in:

- A company, service or product that could be affected by a decision of the Ulster Gliding Club;
- A company, service or product that is in competition with a company, service or product that could be affected by a decision of the Ulster Gliding Club;
- 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 the Ulster Gliding Club; and
- Compensation in the form of fees or salaries if such payment results directly or indirectly from the Director’s, member of the Management Committee’s or employee’s work with the Ulster Gliding Club.

**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. Ulster Gliding Club policy**

It is the policy of the Ulster Gliding Club that no Director, member of the Management Committee or employee while serving as an Officer of the organisation will take personal advantage of his or her role by allowing a situation to exist that may be construed as a conflict of interest.

In addition, the Ulster Gliding Club intends to ensure with reasonable prudence that no Director, member of the Management Committee or employee creates the appearance of realising financial gain of any nature or amount from the Ulster Gliding Club actions.

It is also the intent of the Ulster Gliding Club to carry out its activities in accordance with the highest ethical standards. Adoption of this Policy is, therefore, a reaffirmation of the Ulster Gliding Club 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 the Ulster Gliding Club or which favour the personal advantage of another person or organisation is inconsistent with the duties and responsibilities owed to the Ulster Gliding Club.

The Ulster Gliding Club is committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud and to the rigorous investigation of any such cases.

Directors, members of the Management Committee and employees of the Ulster Gliding Club 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?**

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'.

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 Club Chairman.

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 the Ulster Gliding Club buys a service.
- Any relationship with a named organisation with which the Ulster Gliding Club might do business. Such interests would include: ownership, part-ownership, directorship, shareholder etc.

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**

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:

### *Initial Registration:*

On taking up an appointment with the Ulster Gliding Club the following individuals are required to complete a declaration of interest form (Annex A) and submit the original to the Treasurer of the Ulster Gliding Club:

- Director.
- Member of the Management Committee.
- Employee (full or part time).

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 Treasurer of the Ulster Gliding Club within 28 days of becoming aware of the change.

### *Annual Registration:*

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

### *Limitations on Involvement at Meetings:*

The Chairperson 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 Hon. Secretary will be identified as the alternate facilitator to act when the facilitator is unavailable or is in a position of conflict himself or herself.

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.

The facilitator will use his or her judgement and decide if the declaration actually constitutes an interest in the planned business of the meeting.

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.

The facilitator should ensure all details of conflict raised are recorded in the minutes of the meeting.

## **6. Annual registration**

All Directors, members of the Management Committee and employees must update their declarations on an annual basis via the attached form at Annex A.

Once completed, the form must be recorded on the register of interests by the club Treasurer.

The club Treasurer will maintain a database of interests and provide a referral service in relation to Directors, members of the Management Committee and employees