



## Welsh Target Shooting Federation

### Conflict of Interests

#### Introduction

It is recognised and accepted that occasionally potential conflicts may arise. There is no definitive right or wrong approach to handling potential conflicts of interest. Ultimately, in most cases, the issue is about the application of common sense.

#### Policy Statement

“Members of the Welsh Target Shooting Federation (WTSF) Board and other officials have an obligation to act in the best interests of the WTSF and in accordance with the WTSF’s aims and objectives. Accordingly directors, committee members, employees and others acting on behalf of WTSF must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting WTSF business.”

#### 2.1 Why have such a policy?

WTSF is committed to maintaining the highest standards of corporate governance and conducts its business in an open and transparent manner. The aim of this policy and process is to protect both WTSF and the individuals concerned from any appearance of improper behaviour. Conflicts of interests may arise where an individual’s personal, family or business interests and/or loyalties conflict with the objectives of the WTSF.

Such conflicts may create problems and can:

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

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety. Even the appearance of a conflict of interest can damage the reputation of the WTSF.

“Directors, committee members, key volunteers, employees, consultants and others acting on behalf of WTSF must be free from any conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting WTSF business activities.

WTSF accepts that people may take part in legitimate financial, business, charitable and other activities outside their WTSF 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. All employees must obtain written permission from WTSF before taking on a paid or volunteer role in any other sports organisation.

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

This Policy applies whenever a member of WTSF Board, an employee or other official 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 WTSF or to any other person or body with which WTSF has a relationship (e.g. 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.

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 director disclosure is a requirement under Company Law and is clearly identified within the Company Articles of Association which take precedence over this policy.

## **2.2 The declaration of interests**

Accordingly, all Board Members, employees and other officials must declare their interests, and any gifts or hospitality received in connection with their role in WTSF. A declaration of interests form is provided by the WTSF for this purpose.

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

The declaration of interests needs to be revised or updated at least annually and also immediately any changes occur.

If anyone is not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If anyone would like to discuss their concerns, please contact the WTSF Chair for confidential guidance.

Interests will be recorded on the WTSP's register of interests, which will be maintained by the Company Secretary. The register will usually be accessible by Directors and authorised employees 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, the Board will decide whether the matter needs to be reconsidered and may so direct. In addition, the Chair may decide that the person or person involved may have breached the Board code of conduct\* and further action may be necessary.

Interest	Financial	Non-financial	Actual	Perceived	Potential	Date listed
Self (name)						
Connected Person						

### Data Protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that the Board Member, employees and officials will act in the best interests of the WTSP. The information provided will not be used for any other purpose. Processing of this data shall be undertaken in line with WTSP data control processes, with declarations made by directors being retained for at least 10 years and other individuals for at least 7 years.

### Managing Conflict

The Company Secretary and the Chair 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 be clear and reported in the register.

Conflict of Interest can arise in various scenarios; the most likely is in a meeting situation, therefore WTSP 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 Operations Manager who will be responsible for reviewing the decision made with the Chair and providing written recommendations for any action.

### 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;
- declaring an interest to a particular sponsor or third party (this may be following discussion with, or recommendation of, the Chair)

If you fail to declare an interest that is known to the WTSF Chair or other Board member he/she will declare that interest for you.

### **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 register 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.

If an employee's conflict is deemed non-manageable a copy in writing of the conflict, decision and signed agreement must be placed on the employee's Human Resources file. Such information shall be protected in accordance with the Data Protection Act and restricted to those who require it to fulfil their WTSF responsibilities. The register 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.

### **Managing contracts**

If there is a conflict of interest, (actual, perceived or potential) the interested party must not be involved in managing or monitoring a contract in which they have an interest.

Agreed by the Board	Insert date
Communicated	Insert date
Version Number	Insert V number
Next review date	Insert date

## Declaration of Interest Form

Name:

I hereby declare an interest as set out below (whether pecuniary or other) and undertake to abide by the WTSF policy on such matters and to comply in any decisions of the board with regard to the management of said conflict(s).

Signed:

Dated:

Nature of Interest(s)

Interest	Financial	Non-financial
Self	Please write NONE if nothing applies	Please write NONE if nothing applies
Connected Person	Please write NONE if nothing applies	Please write NONE if nothing applies

### 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 WTSF or to any other person or body with which WTSF 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.

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