



# **BONNYRIGG ROSE COMMUNITY FOOTBALL CLUB**

## ***Club Conflict of Interest – Policy and Procedures***

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**2024-2025**

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# CLUB CONFLICT OF INTEREST – POLICY AND PROCEDURES.

## Introduction

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

## Policy Statement

Officials of Bonnyrigg Rose Community Football Club are required to act in the best interests of Bonnyrigg Rose Community Football Club and in accordance with Bonnyrigg Rose Community Football Club's aims and objectives. For that reason committee members, employees, coaches and others acting on behalf of Bonnyrigg Rose Community Football Club must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the club in conducting Bonnyrigg Rose Community Football Club activities.

### **2.1 Why have such a policy?**

Bonnyrigg Rose Community Football Club 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 Bonnyrigg Rose Community Football Club 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 Bonnyrigg Rose Community Football Club.

Such conflicts may create problems and can:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of the Bonnyrigg Rose Community Football Club; and
- Risk the impression that the Bonnyrigg Rose Community Football Club has acted improperly

The aim of this policy is to protect both the club and the individuals involved from any appearance of wrongdoing. Even the appearance or suggestion of a conflict of interest can damage the reputation of Bonnyrigg Rose Community Football Club.

**Individuals 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 Bonnyrigg Rose Community Football Club, could be open to suspicion of wrongdoing and not put themselves in a position of conflict between their official Bonnyrigg Rose Community Football Club duty and private interest.**

Bonnyrigg Rose Community Football Club accepts that people may take part in legitimate financial, business, charitable and other activities outside their Bonnyrigg Rose Community Football Club roles, but any potential conflict of interest raised by those activities should be disclosed promptly on the declaration of interest form. Employees must obtain written permission from Bonnyrigg Rose Community Football Club before taking on a paid or volunteer role in any other sports organisation.

This policy explains what is viewed by Bonnyrigg Rose Community Football Club as a conflict of interest and the procedure to follow where a conflict of interest arises. Implementation of this policy and procedure must be clear and transparent and not subject to any unfair discriminatory practices.

This Policy applies whenever a committee member of Bonnyrigg Rose Community Football Club, an employee or other official (including coaches) recognises, or should reasonably recognise, that they have 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 Bonnyrigg Rose Community Football Club or to any other person or body with which Bonnyrigg Rose Community Football Club has a relationship (*e.g. Local Authority, Sporting Organisation, 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 an athlete/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.**

## **2.2 The declaration of interests**

All club committee members, employees, coaches and other officials must declare their interests in connection with their role in Bonnyrigg Rose

Community Football Club. A declaration of interest's form is provided by Bonnyrigg Rose Community Football Club for this purpose.

It is the responsibility of the Club Secretary to ensure that individuals 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 your declaration needs to be updated, please err on the side of caution. If anyone would like to discuss their concerns, please contact the Bonnyrigg Rose Community Football Club Chair for confidential guidance.

Interests will be recorded on the Bonnyrigg Rose Community Football Club's register of interests, which will be maintained by the Secretary. The register will usually be accessible by the Club Chair 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 or equivalent, the Chair will decide whether the matter needs to be reconsidered and may so direct.

On receipt of the completed forms the Secretary will update the register with the information declared by each individual.

## **Data Protection**

The information provided will be processed only to ensure that the best interests of Bonnyrigg Rose Community Football Club 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 register and advising on any action required to manage any particular conflict. If a conflict can be managed the process of managing it must be clear and reported in the register.

Conflict of Interest can arise in various ways; the most likely is in a meeting situation or a volunteer/employee/committee selection process, therefore Bonnyrigg Rose Community Football Club has set up the following process to be followed:

a) 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.

b) at a selection meeting session, the Chair is required to ask those involved to declare any interests linked to the person/role being selected. All notification (including "none") 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 all information must be referred to the Club's Quality and Compliance 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, they 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 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. Where it is a committee member or Trustee a copy in writing of the conflict, decision and signed agreement

must be placed in a committee register. Such information shall be protected in accordance with the Data Protection Act and restricted to those who require it to fulfil their Bonnyrigg Rose Community Football Club 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. Ref to HR policy may be required.

Note: Once agreed the Conflict of Interest Policy and Procedures should be regularly reviewed, every 2 years would be normal practice.

*Below is our example of Declaration Form to be completed as part of the process.*

# Declaration of Interest Form

## Declaration of Interest

Name:

I hereby declare an interest as set out below and undertake to abide by **Bonnyrigg Rose Community Football 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)

<b>Interest:</b>	Financial	Non-Financial
Self: <i>Name</i>	<i>Please write NONE if nothing applies</i>	<i>Please write NONE if nothing applies</i>
Connected Person: <i>Name(s)</i>	<i>Please write NONE if nothing applies</i>	<i>Please write NONE if nothing applies</i>

### 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 **Bonnyrigg Rose Community Football Club** or to any other person or body with which **Bonnyrigg Rose Community Football Club** 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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