

Hoci Cymru

Conflict of Interest Policy



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1. Policy Statement

It is the policy of The Welsh Hockey Union Ltd (“Hoci Cymru”) that

“Board Directors, Working Group members, Committee members, key volunteers (including President), employees, consultants and others acting on behalf of Hoci Cymru must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting Hoci Cymru business activities.”

Hoci Cymru 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 Hoci Cymru 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 Hoci Cymru, could be open to suspicion of dishonesty and not put themselves in a position of conflict between their official duty and private interest.

Hoci Cymru accepts that people may take part in legitimate financial, business, charitable, and other activities outside their Hoci Cymru roles, but any potential Conflict of Interest raised by those activities must be disclosed promptly following the guidelines provided on the [Conflict-of-Interest form](#). All employees must obtain written permission from Hoci Cymru before taking on a paid or volunteer role in any other sports organisation.

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

2. Scope and Definitions

2.1. This Policy applies to all the following Hoci Cymru personnel:

- Board Directors and working groups / sub committees.
- Key volunteers (including President).
- Regional chairs and regional committee members.
- Members of committees, working groups, task forces, or similar appointed by Hoci Cymru for any purpose.
- National coaches and team management.
- Full-time, part-time, and casual employees as well as contractors and those undertaking an internship or apprenticeship with Hoci Cymru.
- Any person contracted to undertake work for Hoci Cymru who has any other voluntary role within the organisation or its affiliated bodies.

This Policy applies whenever a person identified above recognises, or should reasonably recognise, that they have a Conflict of Interest.

2.2. A **Conflict of Interest** is a situation in which a person has an interest (defined below) that may compromise that person's obligations to Hoci Cymru or to any other person or body with which Hoci Cymru has a relationship (e.g., GB Hockey, 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 that a reasonable person would consider likely to compromise objectivity.

A *potential* conflict of interest is a situation that could develop into an actual or perceived conflict of interest.

2.3. 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.

2.4. 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.

2.5. **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 of Hoci Cymru, disclosure is a requirement by law and is clearly identified within the Hoci Cymru Articles of Association which take precedence over this policy. Any Director acting in any other role on behalf of Hoci Cymru, at any time, shall first and foremost be considered as a Director and accordingly must adhere to the Articles of Association and this policy.

3. Information Collection Process

The Company Secretary (or other appropriate individual the role is delegated to) shall maintain a register of those individuals who will be required on appointment and at least annually to complete the Hoci Cymru Conflict of Interest form. It is the responsibility of the Company Secretary (or other appropriate individual the role is delegated to) to

ensure that individuals on the register are provided with a Conflict of Interest form and that the completed form is received and retained by Hoci Cymru. Processing of this data shall be undertaken in line with Hoci Cymru Data Protection Policy. The information will be retained for the period from cessation of the conflict and not from the date the conflict is registered.

On receipt of the completed forms the Company Secretary (or other appropriate individual the role is delegated to) will update the register with the information declared by each individual

4. Managing Conflict

The Hoci Cymru Conflict of Interest Panel shall consist of the Company Secretary, the CEO, and the Chair of the Board. The panel shall be responsible for reviewing the Conflict of Interest register and advising of any action required in addition to the standard management process for any particular conflict. If a conflict can be managed, the agreed management process must be clear and reported in the register.

Examples of ways to manage conflict, together with the information relating to the members of a particular Committee / Working Group will be provided, at least annually, to the respective Chair. Information will be provided to any other person as determined by the Conflict of Interest Panel to ensure Hoci Cymru responsibilities are fulfilled.

Conflicts of Interest can arise in various scenarios; the most likely is in a committee situation, therefore Hoci Cymru 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.

The Senior Independent Director or other appropriate individual will replace a Panel member should a referral relate to a member of the Conflict of Interest Panel.

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 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 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 Conflict of Interest Panel); and/or

- temporarily suspending authorised consultancy work until a decision is given by the Conflict of Interest Panel

5. Conflicts That Cannot Be Managed

Situations may arise where the Conflict of Interest Panel decides it is not possible to manage the conflict, in these circumstances the panel will request a meeting with the individual concerned to discuss and agree on 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 Hoci Cymru Data Protection Policy and restricted to those who require it to fulfil their Hoci Cymru 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.

6. 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. Hoci Cymru will take steps to identify such information with individuals as part of the data collection process and agree to its exclusion from publication. This exclusion may also include details relating to conflicts that cannot be managed as noted earlier in this policy document. Requests for all declaration information, suitable for public circulation, will be made available by the Conflict of Interest Panel.

Further Information

For further information about any aspect of Hoci Cymru Conflict of Interest Policy, please contact:

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