

**COTSWOLD GYMNASTICS CLUB CASC LIMITED**

 **CONFLICT OF INTERESTS POLICY**

| **Approved By** | **Owner** |  |  |
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| The Board | CGCCL Directors |   |   |
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| 1.0 | Adopted by CGCCL Directors | Approved  | 1.10.23 |
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This policy applies to all Directors and Employees of Cotswold Gymnastics CLub CASC Limited (‘The Club’)

**Why have a policy?**

A Conflict of Interest is defined as an actual or perceived interest by an employee or Director in an action that results in, or has the appearance of resulting in, personal, organisational or professional gain.

Directors have an obligation to act in the best interests of the Club, and in accordance with the Articles of Association and HMRC CASC governance. Employees and volunteers have similar obligations. Conflicts of interests may arise where an individual’s personal or family interests and/or loyalties conflict with those of the Club (or HMRC CASC governance and regulations).

Such conflicts may create problems; they may:

• Inhibit free discussion;

• Result in decisions or actions that are not in the interests of the Club;

• Risk the impression that the Club has acted improperly; and

• Contravene HMRC Casc governance and regulations.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

**The declaration of interests**

Accordingly, we are asking Directors and Employees to declare their interests, and any gifts or hospitality received in connection with their role in the Club. A declaration of interests form is provided for this purpose, listing the types of interest you should declare.

To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Board or Management Team for confidential guidance. Interests will be recorded on the Club register of interests, which will be maintained by the Board.

**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 Management Committee members and Staff act in the best interests of the Club. The information provided will not be used for any other purpose.

**What to do if you face a conflict of interest**

You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if you face a conflict for any other reason. You may, however, participate in discussions from which you may indirectly benefit, for example where the benefits are universal to all Members.

If you fail to declare an interest that is known to the other Directors, the Board will declare that interest.

**Decisions taken where a Director or Employee has an interest**

In the event of the Board having to decide upon a question in which a Director or Employee has an interest, all decisions will be made by Director vote with a majority required. A quorum of 3 is desirable for the discussion and decision, but may be a minimum of 1 as per section 15.2 of the Articles of Association. Interested parties will not be counted when deciding whether the meeting is quorate.

Interested Directors may not vote on matters affecting their own interests. They may participate in the discussion but not the decision-making process.

All decisions under a conflict of interest will be recorded by the Board and reported in the minutes of the meeting.

The report will record:

• The nature and extent of the conflict;

• An outline of the discussion;

• The actions taken to manage the conflict.

A de minimis exemption applies to contracts less than £500 in value. Random checks against the register of interest will be made on the award of contracts below this value. If the cumulative value of a series of small contracts exceeds £500, the Director will operate the policy used for individual contracts over that sum.

The de minimis exemption does not apply to contracts of employment with the Club.

Independent external moderation may be used where conflicts cannot be resolved through the usual procedures through an independent arbitration service.

**Managing contracts**

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.