

Draft November 2021
THE CONNAUGHT CLUB
Conflicts of Interest Policy

1. Why does The Connaught Club have a Conflicts of Interest Policy?

It is an important principle of good governance that conflicts of interest are recognised, recorded and managed, to promote integrity and transparency.

The Club Bye-laws require that “Members and volunteers must disclose any actual or potential conflicts of interest e.g., in relation to Club meeting agenda items, contracts or tenders for goods and services provided to the Club, when competing for the Club, volunteering for the Club and/or officiating at matches and tournaments.”

2. What is a Conflict of Interest?

A conflict of interest arises when an individual, or a **Closely Connected Person** of the individual, has competing interests or loyalties which might impair their ability to make an objective, unbiased recommendation or decision. For example, if they use their position as a Club Senior Officer or Committee Member to influence a decision to gain a financial or non-financial advantage or benefit for themselves and/or for a Closely Connected Person, potentially at the expense of the best interests, integrity and reputation of the Club and its Members.

The perception of what is a conflict of interest and what are the potential personal benefits or advantages to be gained, are as important as the reality. To manage the risk of any allegations of impropriety this Policy covers:

- All actual as well as perceived or potential conflicts of interest.
- All types of benefits and advantages including, without limitation, financial and non-financial benefits and advantages such as cash rewards, financial discounts, gifts, entertainment, travel and privileged access to tickets, other than tickets received through regular means such as the LTA Wimbledon ballot or other official tennis / sports channels.

See examples in paragraph 6.

3. When does the Conflicts of Interest Policy apply?

This Policy applies to the governance and administration of the Club.

4. Who does The Connaught Club Conflicts of Interest Policy apply to?

This Policy applies to Club Members and Volunteers who participate in the governance, management and administration of the Club including:

- All Senior Officers, and all elected, co-opted and ex-officio Members of Club Committees (“**Committee Members**”)
- All Club Members and individuals who volunteer for the Club and support its management and administration e.g., by helping to organise Club Tournaments and social events,

supporting major initiatives such as the building of new Club facilities, organising major repairs, supervising grounds maintenance contracts, or using their professional expertise and skills e.g., to advise the Club on insurance and review contracts etc. (“**Volunteers**”).

- Note that Committee Members may include the Club Manager, and/or other members of staff and coaches who are ex-officio members of Committees. In this regard they are also covered by this Policy as well as relevant provisions for disclosure of interests in their contract of employment or contract for services to the Club.

“**Club Committees**” include

- The Connaught Management Committee (“**CMC**”)
- The Connaught Club Section Committees (Squash, Bowls and Tennis)
- Any and all sub-committees and working groups that the CMC and Section Committees may appoint from time to time

References in this Policy to the **CMC Chair** mean the appointed Chair of the CMC.

References in this Policy to the Club’s **Senior Officers** mean the elected Club President, and the Honorary Secretary and Honorary Treasurer and their Deputies.

5. Who is a Closely Connected Person?

Who or what is a Closely Connected Person of a Committee Member or Volunteer?

- a) Their spouse, civil / life partner or cohabitor,
- b) Their close family members and financial dependants,
- c) Their close friends and business associates, and/or,
- d) Any enterprise or business in which the Club Committee Member, or a Closely Connected Person, has a personal or financial interest.

It may be difficult to assess whether a family member, friend or business associate is “close”. Please use reasonable judgement in assessing whether a family member, friend or business associate is a Closely Connected Person, and note the guidelines in 6.1 Responsibility for Recognising and Declaring Conflicts of Interest.

6. Examples of Conflicts of Interest

Examples (but not an exhaustive list) of conflicts of interest that could arise in connection with Club operations that should be declared under this Policy include a Committee Member or Volunteer and/or a Closely Connected Person of theirs:

- a) Having a personal or financial interest in any providers of services, goods or professional advisory or consultancy services to the Club e.g.:
 - Repair and maintenance services
 - Sports equipment, furniture, catering and building supplies
 - IT, legal, accountancy and audit.
- b) Being offered any cash, cash equivalent rewards, gifts or other benefits, inducements or incentives that may be offered in return for recommending that the Club engage or contract with a provider of services, goods or professional services to the Club e.g.:
 - Cash or cash equivalents

- Free or discounted services
- Hospitality (e.g., meals, drinks)
- Tickets or privileged access to entertainment and/or sporting events
- Free merchandise (other than de minimis items under £15 value, such as pens, chocolates or baseball caps).

Note that no Member should request any of the above. If a Member, or a Closely Connected Person is offered (or receives without asking) any of the above or other inducement, they must decline the offer and report the matter to the Honorary Secretary who will advise and update the Conflicts of Interest Register as appropriate. See further Section 7 below.

- c) Having an employment relationship or financial interest in the sports played by the Club e.g.:
 - Referee, coach or competition organiser
 - Shareholder, officer or employee of a racket manufacturer or supplier of sports surfaces or equipment
 - Sports sponsorship and management.

- d) Being an officer, employee or representative of a sports association or venue (other than the Connaught Club), whether paid or unpaid e.g.:
 - Employee, Committee Member, licenced referee or official of one of the sports national bodies and/or County Associations i.e., the LTA, England Squash and Bowls England
 - Committee Member, employee or coach of another local tennis, squash or bowls Club.

- e) Organising, supervising or participating in a match or tournament for and on behalf of the Club or held at the Club involving a Closely Connected Person e.g.:
 - Being responsible for selections for Club matches involving Closely Connected Persons
 - Umpiring a match at the Club in which a Closely Connected Person is playing.

- f) Being involved in a complaint, whether as the complainant, the subject of the complaint, or a witness to a complaint incident. The Members' Complaints and Disciplinary Policy provides that in such circumstances, the Committee member must declare their interests and must not participate in the Complaint hearing, decision or appeals process, except to give evidence or to support another Member who is the subject of the complaint, as applicable.

7. What are the key governance principles and procedures to be followed?

Having a conflict of interest does not mean that somebody has done something wrong. It is inevitable that conflicts of interest arise. What is important is that they are recognised, recorded and handled appropriately, so that there is transparency and so as not to risk the integrity and reputation of the Club. This section summarises the responsibilities and procedures to be followed.

7.1 Responsibility for Recognising and Declaring Conflicts of Interest

Committee Members and Volunteers are responsible for recognising and declaring any actual or potential conflicts of interest relating to themselves, or their Closely Connected Persons, and the Club. Because of the risk of perceived conflicts of interest, whether by other Committee Members, Club Members or other persons, Committee Members and Volunteers should err on the side of caution when considering whether the matter is a conflict of interest or not, and whether it requires disclosure. Committee Members and Volunteers may contact the CMC Chair / Section Committee chair or the Club Honorary Secretary, to discuss the matter and receive guidance under this Policy as appropriate.

A shared obligation also exists for Committee Members and Volunteers to recognise when an actual or potential conflict of interest may arise relating to other Committee Members and Volunteers and if they become aware of such a conflict of interest, to flag this to the CMC Chair / Section Committee Chair, or the Club Honorary Secretary, and take action as appropriate. For example:

- The CMC Chair / Section Committee Chair may flag a conflict of interest at a meeting if the relevant individual is not present to disclose the matter themselves.
- The Club Tournament organiser should allocate the umpiring of matches to a Member who is not conflicted, e.g., a parent should not generally umpire a match where their child or relative is playing.

The CMC Chair / Section Committee Chair will also have regard to previously disclosed conflicts of interest when preparing the agenda for Committee meetings and action plans.

7.2 Declaring and Recording Conflicts of Interest

Conflicts of interest should be declared at the earliest opportunity. The Club has instituted the following procedures to support the process of declaring, recording and managing conflicts of interest.

7.2.1 Committee Meetings

The agenda for each meeting of CMC and of the Section Committees shall include a standing item whereby the Chair shall request Committee Members and any other persons present, to disclose any conflicts of interest in relation to matters on the agenda. Committee Members and other individuals present must declare any actual or potential conflicts of interest relevant to the agenda, whether or not they have previously been disclosed to the Committee Chair and/or to the Club Honorary Secretary.

7.2.2 Conflicts of Interest Declaration Form – Senior Officers and CMC Members

When Members are elected as Senior Officers or appointed to the CMC as representatives for their Section, they are expected to declare any actual or potential conflicts of interest that may or could arise in relation to Club operation and activities, by completing a Conflict of Interests Declaration Form and returning it to the Club Honorary Secretary. See Appendix A. Senior Officers and CMC Committee Members will be requested to update this form annually, and to submit an updated form at the earliest opportunity, if a new conflict of interest arises, if there is a

material update to an existing conflict of interest, or if a previously declared conflict of interest no longer applies.

7.2.3 Central Register of Conflicts of Interest

The Club Honorary Secretary shall maintain and regularly update a central register of declared conflicts of interest, in the format recommended by Sport England or an equivalent body, taking into account data protection requirements.

7.3 Managing Conflicts of Interest

The Chair of the meeting is responsible for determining whether an actual or potential conflict of interest exists and if so, how it is to be managed having regard to the examples and principles contained in this Policy and by consulting with the relevant individual, Committee Members and the CMC Chair/Club Honorary Secretary and Senior Officers as appropriate.

The following list is not exhaustive but summarises some of the methods of managing conflicts of interest.

- a) Disclosing in front of the meeting and establishing a record of the conflict of interest in the minutes may on its own be sufficient.
- b) Releasing the Committee Member from the decision-making process and voting.
- c) Declining the benefit, advantage, gift or entertainment proposed or offered.

Where a Committee Member is to be excused from voting due to a conflict of interest, they shall not be counted for the purposes of determining whether a quorum or majority vote exists.

7.3.1 Contracts for goods or services to the Club

Committee Members and Volunteers may not be involved in managing or monitoring a contract or commercial agreement on behalf of the Club, in which they or a Closely Connected Person have a personal interest.

7.3.2 Reimbursement of Expenses

Under Bye-Law 18 Expenses, a Senior Officer may not authorise reimbursement to themselves or to a family member. Note that two signatures are required to reimburse expenses to a Member of £500 or more.

7.3.3 Committee Composition

Sport England guidance is that at least three of the members of the governing or management committee of a Club are neither related to, nor cohabiting with, other Committee Members.

8. Record-keeping and Data Protection

Information provided under this Policy will be processed and stored in accordance with the Club's Privacy Policy, which is designed to comply with the Data Protection Act 2018. The most recent version of the Privacy Policy is displayed on the Club website and noticeboard. The following arrangements are designed to help support data protection compliance and the confidentiality of personal data.

8.1 Conflicts of Interest Declaration Forms and Register of Conflicts of Interest

Completed Conflicts of Interest Declaration Forms and the centralised Register of Conflicts of Interest will be maintained by the Club Honorary Secretary. The Conflicts of Interest Declaration Forms will be deleted within twelve (12) months of the individual ceasing to be a Committee Member or Volunteer.

The following information shall be entered into the central Conflicts of Interest Register maintained by the Club Honorary Secretary:

- a) Name of Committee Member
- b) Description of Interest
- c) Date of disclosure
- d) Whether the wider Committee has been notified of the interest
- e) The nature or type of conflict of interest declared e.g., employment, business interest, gift or entertainment.
- f) Steps taken by the Committee / individual to manage and deal with the conflict of interest.
- g) The nature of the relationship with the Closely Connected Person(s) where relevant e.g., "relative" or "close business associate".

The names of Closely Connected Persons will not be recorded in the Conflicts of Interest Register for data protection reasons unless there are exceptional reasons and steps are taken to remove the name from the Conflicts of Interest Register as soon as the conflict of interest no longer applies.

8.2 Guidelines for recording conflicts of interest in Committee Meeting minutes

When recording conflicts of interest in minutes of meetings, the minute record will be limited to:

- a) The name of the Committee Member / Volunteer and the Committee(s) to which they belong or Volunteer role that they perform.
- b) The fact that a conflict of interest has been declared in relation to the specified agenda item and noted.
- c) If any action is to be taken e.g., recusal from discussion and vote.

9. Breaches of the Conflicts of Interest Policy

Members are reminded that a breach of this Policy may result in disciplinary action being taken under the Members Complaints and Disciplinary Policy.

Appendix A

THE CONNAUGHT CLUB Conflicts of Interest Disclosure Form

The purpose of this form is to enable Connaught Club Committee Members and Volunteers to disclose actual or potential conflicts of interest. Although a Member may not feel that there are conflicts of interest, the disclosure of relationships, interests and financial connections that could be viewed by others as a conflict of interest, affords a more transparent and prudent process.

All Senior Officers and CMC Members must complete this form and disclose any actual or potential conflicts of interest to the Club Honorary Secretary.

Please refer to the Club Conflicts of Interest Policy for further details and guidelines on the types of conflicts of interest that could arise in relation to Connaught Club operations and activities and the disclosure requirements.

Please complete and return this form to the Club Honorary Secretary:
secretary@connaughtclub.co.uk

- I have no potential conflict of interest pertaining to this The Connaught Club Conflicts of Interest Disclosure submission. OR,
- I have the following actual or potential conflicts of interest to disclose:

	Description of Role/Interest/Arrangement. Please also indicate if a financial / commercial interest and/or Closely Connected Persons are involved.
1.	
2.	
3.	

Add further rows if required.

Name (please print):

Connaught Club Committee / Volunteer Role(s):

Committee Member / Volunteer signature:

Date:

Reminder to contact the Club Honorary Secretary and submit an updated form at the earliest opportunity if a new conflict of interest arises, or if there is a material update to an existing conflict of interest, or if a previously declared conflict of interest no longer applies.

V1.0 November 2021