



Conflict of Interest Policy

Purpose

Conflicts of Interest can lead to decisions that are not in the best interests of Croquet England and could be invalid or open to challenge.

However, it is common for Conflicts of Interest to exist in a sports organisation. Having a Conflict of Interest present is not an issue per se, as long as it can be and is managed appropriately. This Policy sets out how both real and perceived Conflicts of Interest shall be managed so that they do not improperly influence decision-making.

Scope

This Policy applies to everyone involved in Croquet England committees including, but not limited to, the Board of Trustees, Executive, Standing Committees and Working groups.

Definitions

A **Conflict of Interest** occurs in an organisation when an individual or Close Connection has a Personal Interest and that Personal Interest conflicts with the interests of the sport or the organisation.

A **Personal Interest** could cover a wide range of circumstances including commercial, financial and sporting interests. It includes not only interests of an individual active in the organisation but also those of their family, close connections and businesses in which they are involved.

A **Close Connection** in broad terms means family, relatives or business partners of an individual, as well as businesses in which they have an interest through ownership or influence. The term includes a spouse or unmarried or civil partner, children, siblings, grandchildren and grandparents, and anyone with whom the individual is cohabiting, as well as businesses where a trustee or family member holds at least one-fifth of the shareholding or voting rights.

For the purposes of this Policy, **Conflicts of Loyalty**, in which an individual's loyalty or duty to another person or organisation could prevent the individual from making a decision only in the best interests of the charity should be treated as a Conflict of Interest.

Policy

1. All individuals have a responsibility to act in the best interests of Croquet England.
2. Any Conflict of Interest must be declared as soon as practicable prior to any discussion or decision to which a real or perceived Conflict of Interest may relate. Whilst responsibility to declare Conflicts of Interest lies with the individual, it is recommended that participants are asked to declare any Conflicts of Interest relevant to agenda topics at the start of each meeting.

3. If the Conflict of Interest affects the chair of a meeting, he or she must step down as chair whilst the relevant topic is discussed.
4. A conflicted individual must withdraw from relevant discussions. The chair of the meeting may decide that an individual may provide any information necessary to help make a decision.
5. Under no circumstances may a conflicted individual take part in a vote or be counted in a quorum for the relevant topic.
6. The declaration of a Personal Interest and how it was handled must be recorded in any notes or minutes of the relevant meeting(s).

Register of Interests

In the interests of transparency and to facilitate accurate reporting to the Charity Commission, Trustees, Officers, Members of the Executive, and those holding Croquet England roles with budget responsibility must declare on a Register of Interests:

- A. Any position as a trustee, director or equivalent of a registered or unregistered charity or company.
- B. Any commercial interests where the individual or close connection individually or collectively hold 20% or more of the shareholding or voting rights.
- C. Any Close Connection who is, or may become, involved in Croquet England. For the avoidance of doubt, this includes but is not limited to any Close Connection who is, or may become, an individual member or associate of Croquet England.
- D. Any other matter which a reasonable third party would consider of clear and material relevance, actual or potential, to the individual's official role.

The Register of Interests shall be maintained by the Secretariat and refreshed after each AGM, although additional items should be declared as they arise.

References

Conflict of Interest Declaration Form

Constitution of Croquet England; Clause 7

Standing Orders of the Board: Clause 19

Charity Commission Guidance: Managing conflicts of interest in a charity

(<https://www.gov.uk/guidance/managing-conflicts-of-interest-in-a-charity>)

Charity Commission Guidance CC29 (<https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29/conflicts-of-interest-a-guide-for-charity-trustees>)

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Reason for Change/Description: Extends the requirement for conflict of interest declarations to include all those holding budget responsibilities (for example, but not limited to, committee chairs).