



## **GRAFTON HOCKEY ASSOCIATION INCORPORATED Conflict of interest policy**

### **1. Purpose**

The purpose of this policy is to help members of **GHA** to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of GHA and manage risk.

### **2. Objective**

GHA aims to ensure that members are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of **GHA**

### **3. Scope**

This policy applies to ALL members of **GHA**

### **4. Definition of conflicts of interests**

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of GHA. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder). It also includes a conflict between a member's duty to **GHA** and another duty that the member has (for example, to a club or business). A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the GHA and must be MANAGED accordingly.

### **5. Policy**

This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem to GHA if they are openly and effectively managed. It is the policy of GHA as well as a responsibility its members, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with any obligations to **GHA**

**GHA** will manage conflicts of interest by requiring ALL members to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches.

#### **5.1 Responsibility of the board**

The board is responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest across the ASSOCIATION
- monitoring compliance with this policy, and
- reviewing this policy on an annual basis to ensure that the policy is operating effectively.

GHA members must ensure that they disclose any actual or perceived conflicts of interests when taking on any roles or positions. This should be disclosed where possible at the time of the election.

## **5.2 Identification and disclosure of conflicts of interest**

Once an actual, potential or perceived conflict of interest is identified, it must be entered into **the GHA** register of interests. Where the majority of board members share a conflict, the board should make the register available to the Public Officer to ensure that disclosure has taken place and steps taken to manage the conflict of interest. The register of interests must be maintained by **the secretary** who shall record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

All conflicts entered must be signed by the Chairperson of any meeting and submitted to the Secretary for GHA records. The Board may appoint an impartial member to attend any such meeting where a conflict of interest has been identified to ensure that appropriate steps are taken to manage the conflict of interest.

### **Confidentiality of disclosures**

**Details of who will have access to the information disclosed, shall be restricted to board members, except in the case where there is a conflict involving a majority of board members present which will then be made available to and signed by the Public Officer.**

## **6. Action required for management of conflicts of interest**

### **6.1 Conflicts of interest**

Once the conflict of interest has been appropriately disclosed at a meeting, Those present must decide whether or not those conflicted members should:

- be replaced by another for the purpose of the decision that involves the conflict. (For small groups this is best)
- vote on the matter
- participate in any debate, or
- be present in the room during the debate and the voting.

### **6.2 What should be considered when deciding what action to take**

- In deciding what approach to take, the board will consider whether the conflict needs to be avoided or simply documented
- alternative options to avoid the conflict

☐ GHA's objects and resources, and the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of GHA.

The approval of any action requires the agreement of at least a majority of the board (excluding any conflicted board member/s) that are present and voting at the meeting. The action and result of the voting will be recorded in the minutes of the meeting and in the register of interests.

## **7. Compliance with this policy**

If the board has a reason to believe that a person subject to the policy has failed to comply with it, it may investigate the circumstances.

If it is found that this person has failed to disclose a conflict of interest, the board may take action against them. Depending on the severity of the breach this may include:

- A caution and a reminder that conflicts **MUST** be disclosed so that they can be managed
- A review of any decisions made.
- Disciplinary action outlined in the GHA Constitution.