

WEST LONDON CONFLICT OF INTEREST POLICY

OBJECTIVE

West London Minor Hockey must meet high standards to merit the trust of its participants, Alliance Hockey and the public.

The integrity of our association is based on ethical behavior throughout and fair, well-informed decision making.

The ability to make decisions is sometimes affected by other interests (personal or professional) of individuals in the organization. Such conflict-of-interest situations are a regular part of organizational and personal life and cannot simply be eliminated.

The objective of this policy is to allow West London to manage conflict of interest situations successfully and to resolve them fairly.

SCOPE

This policy applies to all members of the Board of Directors and all staff of West London Minor Hockey. It also applies to volunteers, but formal procedures should consider their circumstances. Collectively, these three groups are called “affected persons” below.

DEFINITIONS

Conflict of Interest: A conflict of interest is a situation in which a person has a private or personal interest to appear to influence the objective exercise of their official duties with West London Minor Hockey.

Private or personal interest: Refers to an individual’s self-interest (i.e. to achieve financial profit or avoid loss, or to gain another special advantage or avoid a disadvantage); the interests of the individual’s immediate family or business partners; or the interests of another organization in which the individual holds a position (voluntary or paid).

Objective exercise of duties refers to an individual’s ability to carry out their responsibilities in the best interest of West London Minor Hockey.

TYPES OF CONFLICT

A Board member, employee or volunteer of West London Minor Hockey may be in a conflict-of-interest situation that is:

- a. Actual or real, where their official duties are or will be influenced by their private interests.
- b. Perceived or apparent, where their official duties appear to be influenced by their private interests.
- c. Foreseeable or potential, where their official duties may be influenced in the future by their private interests.

EXAMPLES OF CONFLICTS OF INTEREST

- 1) Self-interested funding, contracting, or hiring when an affected person uses a position in West London Minor Hockey to influence a decision to provide funding or contracts to another organization in which they have an interest, or to go outside normal hiring processes to give a job to a friend or family member.
- 2) Improper influence: when an affected person solicits or accepts some form of benefit in return for influencing West London Minor Hockey activities or promoting someone else's interests in West London Minor Hockey.
- 3) Inappropriate outside activity: when an affected person's activities outside of West London Hockey conflict with the interests of West London Hockey.
- 4) Accepting undue benefits, such as significant gifts which place an affected person under obligation to the donor (member association, Sponsor, client).

RESPONSIBILITIES

Overall Responsibility: Members of the West London Board of Directors, staff and volunteers are responsible for managing conflict of interest situations to ensure that workplace behavior and decision-making throughout the association are not influenced by conflicting interests.

Responsibility for Prevention: West London supports an organizational culture in which people freely take responsibility for both "self-declaring" possible conflicts of interest, and respectfully raising possible conflicts faced by others in the organization. This culture makes it possible to avoid any such situations from arising in the first place. Staff, volunteers and Board Members have the responsibility of implementing appropriate practical preventive measures, such as:

- 1) Providing education about what to do when gifts and hospitality are offered.
- 2) Providing meeting agendas in advance to enable participants to foresee possible conflicts.

- 3) Ensuring that people are clearly told when information must be protected from improper use.
- 4) Declining involvement in an action (such as supporting a questionable outside activity).

Responsibility for Managing: Where prevention is not the solution, conflict of interest situations must be managed. Here are the steps to be taken by those involved in such situations, working together and supporting one another's ethical responsibilities:

- 1) Declare it. Ensure transparency by self-declaration, and by making sure that a record of the declaration is made.
- 2) Discuss it. In a doubtful situation, take a moment for a quick word with the chair of your meeting, or undertake a full dialogue with the group, if the situation warrants it.
- 3) Deal with it. Measures to mitigate or eliminate a conflict of interest will depend on what is appropriate to the severity of the situation.

Options include:

- a. Restrict the involvement of the individual. For example, the individual may withdraw from decision-making. This would not be appropriate if the conflict of interest arises frequently, or if the individual cannot be separated from parts of the activity.
- b. Recruit a third party to assist. For example, ask a disinterested party to sit on a hiring board, or apply the appeal process. There will be situations where no appropriate third party is available.
- c. Remove the individual from affected duties. When "restrict" and "recruit" are not suitable options, the individual with the conflict may be removed from duties or discussions related to the conflict. The individual could transfer to other duties.
- d. Relinquish the private interest. In cases of serious conflict, the individual may choose to drop the private interest, such as membership on the Board of another organization, which is causing the conflict.
- e. Resign from the official duties. In serious cases where other solutions are not possible, the individual may have to resign from the position creating the conflict.
- f. Document what has been done. Board minutes, correspondence to interested parties, or other documentation will provide a record of steps taken.

POLICY APPLICATION

This policy must be explained to all new Board Members, staff and volunteers. All such affected persons must agree in writing, at the outset of taking a position or volunteering with West London Minor Hockey, that they will abide by this policy.

At that time, Board Members and staff must disclose possible conflict situations to the President in confidence. Subsequent material changes must be disclosed when they first emerge. Volunteers must inform the President of possible conflict situations.

The President will indicate to each individual whether any further action is necessary to manage the possible conflicts of interest disclosed. Actions might include the following, depending on the severity of the conflict:

- a. Declaring the conflict to all concerned before discussion or decision-making;
- b. Withdrawing from final decision-making only;
- c. Withdrawing from all aspects of discussion and decision-making.

The President is also the final authority on resolving disputes, for example when an individual does not agree with the perception that he or she is facing a conflict of interest.

The President is the authority on dealing with real conflicts of interest which are discovered “after the fact”. A variety of serious measures, such as cancelling a contract or hiring decision, may have to be considered, case by case, in such situations.

For the purposes of this policy, the President is the appropriate authority in all matters relating to the affairs of the Board.