



## GREAT BRITAIN DISABILITY FOOTBALL ASSOCIATION LTD ('GBDFA')

### Declaration of Interests Policy

#### 1) Who needs to read this?

- Board members (both executive and non-executive directors), staff and all voluntary posts acting on behalf of GBDFA

#### 2) Why do you need to read it?

- To demonstrate that you understand GBDFA's accountability and transparency in any outside activities which directors, employees and/or volunteers may be involved with.
- To ensure vigilance and awareness with regard to anti-fraud and corruption prevention.
- To protect the directors, employees and those volunteers who hold a position of responsibility, and also GBDFA's reputation, if challenges are made.
- To ensure that GBDFA is not only notified of an outside interest but an application procedure is put in place so that GBDFA is able to reject an individual if that director's, employee's or volunteer's involvement would result in the risks listed below.

#### 3) What are the risks of not complying with this Policy?

- GBDFA could be open to questions of impropriety and mismanagement of its financial and decision-making processes.
- There could be exploitation of insider knowledge and contacts (and it could be argued that someone may be using their position within GBDFA to secure sales for their personal benefit).
- Conflicts could arise in demands on directors', employees' and volunteers' time from personal interests vying with officer duties.
- Directors, employees and volunteers involved in spending public money could benefit personally from decisions they make.
- There could be a lack of transparency in the way businesses are assessed before they begin to have contractual relationships with GBDFA.

In order to manage and mitigate these risks, clear controls and assessment procedures are needed.

#### 4) Who needs to declare an interest?

- All directors, employees and volunteers acting on behalf of GBDFA who have **direct financial interests in a business** which trades, or could potentially trade, with GBDFA.

- All directors, employees and volunteers acting on behalf of GBDFFA who **indirectly have financial interests in a business** (through a business partner, spouse, life partner or close relative) who trades, or could potentially trade, with GBDFFA.
- All directors, employees and volunteers acting on behalf of GBDFFA who have direct or indirect interests in charities, funding bodies, and/or other sports bodies which have a working relationship with GBDFFA.

## 5) What types of interests need to be declared?

- Directorships, including non-executive directorships, held in private companies or PLCs (with exception of those of dormant companies);
- Ownership or part-ownership of private companies, businesses or consultancies likely or possibly seeking to do business with GBDFFA;
- Majority or controlling shareholdings in organisations in the field of sport or sports business;
- A position of authority in a charity or voluntary organisation in the field of sport or sports business;
- Any relevant research funding, grants or donations you have received;
- Any interest in any organisation that provides services to GBDFFA;
- Any close relative, spouse or partner who has directorship of public or private companies likely or possibly seeking to do business with GBDFFA;
- Outside interests that may have conflicting time demands and so could possibly affect the performance of duties in GBDFFA. (Examples include: second or third jobs, management of companies);
- Remunerated and honorary positions or other connections with organisations which may give rise to a conflict of interests;
- Representational or other non-financial interests in areas covering GBDFFA business;
- Small personal interests whereby you do not have contractual relations with GBDFFA but may sell goods on a small scale to employees or members of GBDFFA. (Although individually these may not be large amounts, over a period of time, they could amount to a substantial sum.)

## 6) How do I declare relevant interests?

Please complete the official Declaration of Interests form, which is appended to this Policy and can otherwise be obtained from the Company Secretary.

This form must be completed and returned to the Company Secretary before you commence work for GBDFFA (whether as a director, an employee or a volunteer).

You will need to keep the information up-to-date by:

- a) alerting the Board to any changes under the Declaration of Interests item on the agenda at each Board meeting; and
- b) completing a new form and returning it to the Company Secretary at the beginning of each financial year, or when your circumstances change substantially.

If in doubt, then please discuss with your line manager or the Company Secretary, who will advise.

## 7) Minimum Management Arrangements

- (a) GBDFFA is required to maintain a single Register of Interests, which is to be overseen by the Company Secretary. Appendix A outlines the minimum details required on the form for each individual, while Appendix B sets out a framework for the Register.

The Register must be properly maintained, open to inspection and reviewed at least annually by the Company Secretary and the Governance & Finance Committee to ensure that information is kept up to date. Any updates notified in Board meetings need to be reviewed promptly by the Company Secretary.

- (b) All directors, employees and volunteers who are acting on behalf of GBDFFA are required to complete the Declaration of Interests form. Each Director is responsible for informing all members of any sub-committees which s/he chairs of the requirement for them to complete the form.
- (c) Further details may be found in the Terms of Reference for the Board of Directors, and in any 'Codes of Conduct' which apply separately and from time to time for all Directors, employees and staff of GBDFFA.

Document Control:

<b><i>Policy Details</i></b>			
Declaration of Interests Policy			
<b>Status</b>	Initial Draft v1	<b>Date</b>	June 2013
<b>Adopted by</b>	GBDFFA	<b>Date</b>	January 2014
<b>Reviewed</b>	Company Secretary	<b>Date</b>	15 November 2019

**APPENDIX A**

**DECLARATION OF INTERESTS**

**Please provide:**

- **details of each interest; and**
- **whether the interest applies to you or, where relevant, a close relative or personal connection**

**Please refer to Section 5 of the GBDFFA Declaration of Interests Policy for guidance on the types of interest to be included. If any section is not applicable to you, please mark 'N/A' in the box.**

I, ....., as a Director / Staff Member / Volunteer\* acting on behalf of the Great Britain Disability Football Association Ltd, set out below my interests in accordance with the GBDFFA Declaration of Interests policy. [\* Please delete as appropriate.]

<b>CATEGORY</b>	<b>INTEREST</b>
Current employment and/or any previous employment in which you continue to have a financial interest:	
Paid or voluntary appointments and roles (e.g. Non Executive Director, Charity Trustee):	
Membership of any professional bodies, special interest groups or mutual support organisations:	
Any contractual or other business relationship(s) with the GBDFFA:	
Any role coaching or managing disability football teams or individual athletes:	
Any other potential conflicts that are not covered above:	

*If you have identified any close relative or personal connection in any of the interests declared above, please give their name(s) and the relationship / connection to you in the boxes below:*

NAME(S)	RELATIONSHIP / CONNECTION

I declare that to the best of my knowledge the information on this Declaration of Interests Form is complete and correct.

I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis.

I give consent for it to be used for the purposes described in the Declaration of Interests & Management of Conflicts of Interest Policies and for no other purpose.

SIGNED	NAME	DATE

**APPENDIX B:**

**REGISTER OF INTERESTS**

<b>Name of director / staff member / volunteer</b>	<b>Description of interest</b>	<b>Does the interest relate to the director / staff member / volunteer, or a person connected to them (describe)?</b>	<b>Is the interest current?</b>

