



Water Safety Ireland

Conflicts of Interest Policy

1. Purpose

The purpose of this policy is to assist Water Safety Ireland (WSI) to effectively identify, record and manage any potential conflicts of interest in order to protect the integrity of WSI and to ensure that all members of WSI act in the best interest of WSI. This policy should be read and applied in conjunction with Water Safety Ireland's Code of Business Conduct.

2. Objective

Through the implementation of this policy the Council of WSI aims to ensure that the WSI members are aware of their obligations to disclose any potential conflicts of interest that they may have, and by complying with this policy ensure that identified conflicts are effectively managed in the interests of WSI.

3. Scope

This policy applies to Members of the Council of WSI, All employees of WSI. All Officers of Water Safety Area Committees and all members of WSI who undertake actions on behalf of WSI where potential conflicts of interest may arise.

4. Definition of Conflict of Interest

A conflict of interest is any situation in which a WSI Employee or Member personal interests or loyalties could, or could be seen to, prevent that person making a decision in the best interests of WSI. This personal interest may be direct or indirect and can include interests of a person connected to WSI member or Employee.

Conflicts of interest may also arise if an Employee or Member of WSI is offered and accepts gifts arising from their activity on behalf of the organisation. In cases where such a gift (Such as meals, vouchers etc) is offered the employee or member should consult with the CEO prior to accepting such gifts. The gifts register will be updated accordingly.

These situations present the risk that a person will decide based on, or affected by, these influences, rather than in the best interests of WSI and therefore 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 the charity if they are openly and effectively managed. It is the policy of WSI as well as a responsibility of its Council that ethical, legal, financial, or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with their obligations to WSI.

WSI will manage conflicts of interest by requiring Employees and members to

- Avoid conflicts of interest where possible

- identify and record any conflicts of interest
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches.

5.1 Responsibility of the WSI Council

The Council of WSI is responsible for:

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

The Council of WSI should ensure they are aware of their legal obligations in the management and control of their charity and should refer to the Charities Regulator's 'Guidance for Charity Trustees' for further information on this. (See the Charities Regulator website.)

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 WSI's register of interests, as well as being raised with the Council of WSI. The register of interests must be maintained by the Chief Executive, And record all information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it). This register should be updated annually.

In addition, the CEO will maintain a register of gifts received by employees or members.

Confidentiality of disclosures

All potential or actual conflicts of interest must be disclosed in the first instance to the Chief executive of WSI. All details of potential or actual conflicts of interest will be secured as confidential. Details may be shared only with the Chairman and the chair of the Audit Commission. Summary details may be supplied to the Council on a confidential basis if required.

6. Action required for management of conflicts of interest

6.1 Conflicts of interest of Employees and Members of WSI.

Once a potential conflict of interest has been appropriately disclosed, the Council of WSI (excluding the disclosing person and any other conflicted person) must decide whether an actual conflict exists.

In exceptional circumstances, such as where a conflict is very significant or likely to prevent a Council member from regularly participating in discussions, it may be worth the Chair of WSI considering whether it is appropriate for the person with the relevant conflict to resign from the Council.

6.2 What should be considered when deciding what action to take

- In deciding what approach to take, the Council of WSI will consider whether the conflict needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making on behalf of WSI
- alternative options to avoid:
- the conflict with the objectives of WSI
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of WSI.

The approval of any action requires the agreement of at least a majority of the Council of WSI (excluding any conflicted person who are present and voting (if applicable) at the meeting. All details regarding the conflict of interest, including the action arising, will be recorded in the minutes of the meeting.

7. Compliance with this policy

If the Council of WSI has a reason to believe that a person subject to this policy has failed to comply with it, it will investigate the circumstances.

If it is found that this person has failed to disclose a conflict of interest, Council of WSI may take action against the person. This may include seeking the person's resignation from WSI.

If a person suspects that an Employee or Member has failed to disclose a conflict of interest, they must notify the CEO in writing of their concerns. The CEO will investigate such notifications and make a report the Council on the outcome of the investigation.

Contacts

For questions about this policy, contact the Chair or Chief Executive Officer of WSI.

Document History

| | Name | Title | Signed | Date | Revision |
|---------------------|-----------------|-----------------------|--------|----------------------|--|
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| Reviewed By: | Jennifer O'Neil | Compliance Officer | | February 2022 | Added reference to Code of Business Conduct |
| Approved By: | Council | | | February 24, 2022 | |