



Conflict of Interest Policy

1. Policy Statement

The World Curling Federation has a duty to ensure that all aspects of their business dealings with members, suppliers and individuals are carried out with the utmost honesty and integrity. As such, this document sets out the WCF policy for identifying and managing conflicts as well as potential or perceived conflicts of interests for all persons involved in WCF activities.

2. Application

This policy is applicable to the following groups of people (hereinafter referred to as “WCF Personnel”):

2.1 Each person serving as a member of the WCF Board, including the WCF President, the WCF Secretary General, WCF Board Members and any member standing for election to the WCF Board. The Directors of the WCF have a legal obligation to act in the best interests of the WCF and its members and, by adopting this policy, they confirm their obligations are understood

2.2 Each person serving as a member of a Committee, Commission or Working Party of the WCF

2.3 Each person employed (whether full-time, part-time, permanently, for a fixed term or on a temporary basis) or engaged as a supplier, consultant, or contractor

2.4 Each person appointed or assigned by the WCF to work / volunteer at a WCF organised event and / or attend an event on behalf of the WCF. Namely any person who receives accreditation for an event as a representative of the WCF.

3. Conflicts of Interest

There are three types of conflict of interest:

- a) An **apparent conflict of interest** arises where a member of WCF personnel does not have a conflict of interest, but someone could be justified in thinking one exists. Apparent conflicts can be as damaging as potential or actual conflicts because they may cause suspicion and, therefore, need to be resolved wherever possible

- b) A **potential conflict of interest** occurs when a member of WCF personnel has a conflict with respect to a certain judgement, but is not yet in a position where that judgement must be exercised
- c) A potential conflict becomes an **actual conflict of interest** when a member of WCF personnel is able to exercise that judgement

A conflict of interest is considered to exist:

3.1 Whenever a person might think that a member of the WCF personnel might be influenced to put their (or any other person's) personal or business interests before the interests of the WCF

3.2 Whenever a person might think that the member of the WCF personnel would benefit directly / indirectly from information received by, or a decision made by the WCF

3.3 Where a member of the WCF personnel has two separate and competing interests and it is unclear as to which interest they are acting for in a particular case.

3.4 In assessing whether a situation of conflict of interest exists, direct as well as indirect interests must be considered. This includes the interests of a third person or entity such as:

3.4.1 Any parent, grandparent, child, stepchild, grandchild, brother, sister, or spouse of a member of WCF personnel or any person living with the member of WCF personnel as his or her partner

3.4.2 A firm, company, or association in which the member of the WCF personnel is a partner, employee, consultant, director, member or shareholder

4. Duty to avoid conflicts of interest

4.1 Each member of WCF personnel must avoid any situation involving, or that could lead to actual, potential, or perceived, present or future conflicts, between personal interests and official duty or work-related activities.

4.2 If a conflict of interest or, a potential or perceived conflict of interest exists, it must be declared by the member of WCF personnel.

4.3 Any doubt as to whether certain facts or circumstances may give rise to a conflict of interest should be resolved in favour of declaring those facts or circumstances.

5. Declarations of interests

5.1 Upon appointment, each member of WCF personnel shall declare, in writing, all personal interests of any kind which may result in an actual, potential, or perceived conflict of interest, when carrying out a WCF duty. This declaration must include:

5.1.1 Directorships, partnerships, employment or ownership / financial interests with Member Associations, leagues, clubs, or businesses that are engaged in the sport of Curling or derive any substantial portion of their revenue from Curling

5.1.2 Trusteeships or board positions with Member Associations, or institutions or charities that are engaged in the sport of Curling or derive any substantial portion of their revenue from Curling

5.1.3 Any material interests arising from close family or personal relationships with another member of WCF personnel

5.2 Any actual, potential, or perceived conflict of interest must be declared, in writing, to the WCF Secretary General

6. Managing conflicts of interest

The relevant authority, set out below, will decide on how to manage the conflict of interest that has been declared:

6.1 WCF President – for conflicts of interest relevant to WCF Board members or the WCF Secretary General

6.2 WCF Vice Presidents – for conflicts of interest relevant to the WCF President

6.3 WCF Secretary General – for conflicts of interest relevant to other members of WCF personnel

6.4 Commission / Meeting Chair – for conflicts of interest which become relevant during a meeting

Potential Breaches/Violations of the Policy

1. If the above-mentioned personnel have reasonable cause to believe that a person has failed to disclose actual or possible conflicts of interest, they shall inform the person of the basis for such belief and afford the person an opportunity to explain the alleged failure to disclose

2. If, after hearing the response of the person and making such further investigation as may be warranted in the circumstances, the investigating individual determines that the person has in fact failed to disclose an actual or possible conflict of interest, they shall take appropriate disciplinary and corrective action which may include, but not limited to:
 - a. discussions with the person about desired behaviours
 - b. a verbal or written warning to the person
 - c. suspension from the role
 - d. dismissal from the role

6.5 The deciding authority may decide, however, that the person in question:

6.5.1 can continue to perform their duties and / or participate as normal in a meeting during which the interest will be minuted

6.5.2 shall not participate in the meeting and is to abstain in any vote or decision making

6.5.3 will withdraw for the whole or part of the affected meeting

6.6 This decision is final with no opportunity to appeal

WCF DECLARATION OF INTERESTS FORM

To the best of my knowledge, I, the undersigned, declare that the following information is complete and correct:

- I have read, understood, and agree to be bound by, and comply with the WCF Conflict of Interest Policy
- I do not have and nor do I currently anticipate having any conflict of interest, actual or potential, other than is set out in this Declaration Form
- I agree to review the information provided on a regular basis
- I agree to be bound by any decisions taken by relevant authorities in accordance with the WCF Conflict of Interest Policy
- I agree to the information detailed in this form will be used for its intended purpose and no other

NAME	First Name: Surname:
POSITION:	
Details of conflict of interest (actual, perceived or potential) Please indicate "no conflict of interest" if applicable	
Place Date	
Signature	