



Regulation 7.1 – Governance & Conflict of Interest Policy.

Effective date: June 2025

Acknowledgements

MUSC CIC would like to express our thanks to the following organisations who have assisted in the development of this policy

POLICY STATEMENT

Mariners United Sporting Club CIC (MUSC CIC) is committed to the highest standards of governance, integrity and accountability. The organisation recognises that conflicts of interest can arise where personal, professional, financial or organisational interests have the potential to influence, or be perceived to influence, decision-making.

MUSC CIC is committed to identifying, declaring and managing conflicts of interest openly and transparently to protect the integrity of its decision-making, safeguard public trust and ensure that all actions are taken in the best interests of the organisation and the communities it serves.

1. INTERPRETATION

For the purposes of this regulation, a conflict of interest is any situation in which an individual's personal, professional, financial or other interests could improperly influence, or be perceived to influence, their duties, judgement or decision-making on behalf of MUSC CIC. Conflicts may be actual, potential or perceived.

This policy applies to all MUSC CIC directors, officers, staff, volunteers, contractors, consultants and any individual acting on behalf of MUSC CIC.

2. PURPOSE AND GOVERNANCE PRINCIPLES

The purpose of this policy is to ensure that decisions are made objectively, fairly and in the best interests of MUSC CIC. The policy supports good governance by promoting transparency, accountability and ethical conduct and by protecting the organisation and individuals from reputational, legal or financial harm arising from unmanaged conflicts of interest.

3. EXAMPLES OF CONFLICTS OF INTEREST

Conflicts of interest may arise in a wide range of circumstances. These may include, but are not limited to, financial interests in organisations that may seek contracts, funding or partnerships with MUSC CIC; personal or family relationships with staff, volunteers, suppliers or partners; positions held in other organisations whose interests overlap with or compete with those of MUSC CIC; receipt of gifts, hospitality or benefits that could influence decision-making; or any situation where an individual may gain personal benefit from a decision made in their MUSC CIC role.

Perceived conflicts are treated with the same seriousness as actual conflicts, as they may undermine confidence in governance arrangements.

4. DECLARATION OF INTERESTS

All directors, staff and relevant volunteers must declare any interests that could give rise to a conflict of interest. A declaration of interests must be completed on appointment or election and updated annually, and whenever circumstances change.

Declarations must include details of financial, professional, personal or other interests that may reasonably be perceived to conflict with MUSC CIC's interests. A Register of Interests shall be maintained by MUSC CIC and reviewed regularly to ensure it remains current and accurate.

5. IDENTIFICATION AND MANAGEMENT OF CONFLICTS

Individuals are responsible for identifying and declaring conflicts of interest as soon as they become aware of them. Where a conflict is identified, MUSC CIC shall determine appropriate mitigation measures, which may include restricting access to information, excluding the individual from discussions or decisions, or, where necessary, requiring the individual to withdraw from a role or activity.

The approach taken shall be proportionate to the nature and seriousness of the conflict and shall be documented appropriately.

6. CONFLICTS AT MEETINGS AND DECISION-MAKING

Declarations of interest shall be a standing item at meetings of the MUSC CIC Board and relevant committees. Individuals must declare any conflicts of interest relating to agenda items, regardless of whether they have been declared previously.

Where a conflict is declared, the Chair shall determine how the conflict is to be managed. This may include allowing the individual to participate in discussion but not decision-making, or requiring them to withdraw from the meeting for the relevant item. All declarations and actions taken shall be recorded in the minutes of the meeting.

7. GIFTS AND HOSPITALITY

MUSC CIC recognises that the giving and receiving of gifts or hospitality may occur in the course of activities. However, gifts or hospitality that could influence, or be perceived to influence, decision-making must be declared.

Any gift or hospitality above a reasonable or modest value must be reported and recorded in a Gifts and Hospitality Register. MUSC CIC reserves the right to refuse or require the return of gifts or hospitality where acceptance would compromise, or appear to compromise, impartiality or integrity.

8. RAISING CONCERNS AND BREACHES

Any concerns regarding conflicts of interest, or breaches of this policy, should be raised promptly. Concerns may be raised informally with a line manager or senior representative, or formally in writing where appropriate.

Concerns that cannot be resolved informally will be investigated in accordance with MUSC CIC governance procedures. Serious breaches may also be addressed through the Complaints Policy, Whistleblowing Policy or disciplinary procedures where applicable.

9. NON-COMPLIANCE AND CONSEQUENCES

Failure to declare or appropriately manage a conflict of interest may have serious consequences for MUSC CIC and the individual concerned. Non-compliance may result in disciplinary action, removal from role, termination of association or referral to external authorities where required.

10. RECORD KEEPING AND TRANSPARENCY

MUSC CIC shall maintain accurate records of declared interests, mitigation actions and decisions taken in relation to conflicts of interest. Records shall be held securely and made available for inspection where required by auditors, regulators or funders, in line with data protection requirements.

11. REVIEW AND COMPLIANCE

This policy shall be reviewed periodically by the MUSC CIC Board to ensure it remains effective, compliant with governance expectations and appropriate to the organisation's activities. All individuals covered by this policy are required to comply with its provisions as a condition of their involvement with MUSC CIC.

12. RELATED DOCUMENTS

This policy should be read in conjunction with MUSC CIC's Code of Conduct, Whistleblowing Policy, Complaints Policy & Procedure, Data Protection & GDPR Policy and any Declaration of Interests or Gifts and Hospitality Registers.