



REGISTER OF INTERESTS POLICY

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Introduction

The Chartered Institute for the Management of Sport and Physical Activity (CIMSPA) trustees have a duty under common law to act in the best interests of CIMSPA. Trustees should not benefit from the institute and should not be influenced by their wider interests when making decisions affecting CIMSPA. This is in accordance with each trustee's legal duty to avoid conflicts of interest under s175 of the Companies Act 2006.

Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of CIMSPA. Conflicts such as these may:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of CIMSPA
- Risk the impression that an individual has acted improperly

The aim of this policy is to protect both CIMSPA and the individuals involved from any appearance of impropriety.

Scope

In addition to Board trustees, CIMSPA's employees, non-executive committee members, contractors, quality assurance assessors, internal verifiers, consultants and volunteers (referred to as 'CIMSPA's People') are also required to not benefit from the institute (outside of their contracted purposes) and should not be influenced by their wider interests when making decisions or actions which impact or affect CIMSPA.

Whilst the legal duty that applies to trustees and executive staff does not apply to all CIMSPA's People, CIMSPA's approach to conflict management is to uphold the highest possible standards and exemplar governance across the entire organisation.

CIMSPA prioritises transparency, quality, and professionalism in all its undertakings, and compliance to this policy is therefore required by all CIMSPA's People.

Purpose

This Register of Interests Policy outlines the requirements for CIMSPA's People to register any interests that they, or their related parties, may have and the required practice that CIMSPA's People must undertake, to register such interests when acting on behalf of the institute.

The aim of this policy is to protect both CIMSPA and its People from any act of or appearance of impropriety.

Definitions

Entity

It is neither desirable nor possible to define in advance all the different types of entity however for the purpose of this policy an entity is defined as any business, corporation, partnership, limited liability company, associations, bodies or other types of organisations in which the CIMSPA person or their related party (parties) has either direct or indirect control.

Related Parties

Related Parties is a term used for those people or organisations that are closely connected to CIMSPA's People. It is neither desirable nor possible to define in advance all the different types of related parties, relationships or sets of circumstance where there may be real or perceived need to register interests with CIMSPA. For the purposes of the Register of Interests Policy, a related party could include a spouse, civil partner or domestic partner, parent, child, other close member of the family, business partner or anyone else who has the potential to influence one of CIMSPA's People in relation to their role with CIMSPA. A related party may have the following which CIMSPA's People are required to register:

- Control or joint control over an entity;
- Significant influence over an entity; or
- Is a member of the key management personnel of an entity.

Control

Control relates to the ability to direct the financial and operating policies of an entity with a view to gaining economic benefits from its activities. Control can be classified under the following categories:

- More than 50% of the voting power
- Between 20% and 50% of the voting power
- Less than 20% of the voting power
- No voting power
- Rights to between 20% and 50% of the equity
- Rights to less than 20% of the equity
- No rights to equity

Interests

It is neither desirable nor possible to define in advance all the different types of interest, however examples of interests include but are not limited to:

Direct financial interest - when CIMSPA's People obtain a direct financial benefit via:

- The payment of a salary from a third-party organisation to one of CIMSPA's People
- The award of a contract to a company CIMSPA's People have a relationship or involvement with

Indirect financial interest - when a related party of CIMSPA's People benefits from CIMSPA via:

- The awarding of an employment contract or a grant to a related party; of CIMSPA's People.

Non-financial or personal conflicts – where CIMSPA's People receive no financial benefit, but are influenced by external factors:

- Influencing Board, operational or strategic decisions to their own advantage
- To gain some other intangible benefit, recognition or kudos
- Awarding contracts to friends
- Conflicts of loyalties - CIMSPA's People may have competing loyalties between CIMSPA, to which they owe a primary duty, and some other person or entity.

Holding Shares – Holding shares or share ownership is defined as anything greater than 1%

Business arrangements and beneficial interests - Business arrangements and beneficial interests are defined as the ability to exert influence or be influenced.

Affiliations or involvement - Affiliations or involvement includes:

- Having a direct/indirect relationship with an individual or entity which has business dealings with CIMSPA, receives or received funds from CIMSPA or which is engaged in non-profit-making activity. This could include the transfer of resources, services or obligations between related parties, regardless of whether a price is charged, and may include the following:
 - Purchases, sales, leases and donations (including donations which are made in furtherance of the charity's objects) of goods, property, money and other assets such as intellectual property rights to or from the related party.
 - The supply of services by the related party to the charity, and the supply of services by the charity to the related party. Supplying services includes providing the use of goods, property and other assets and finance arrangements such as making loans and giving guarantees and indemnities.

- Any gifts or hospitality received in connection with their role in the charity.
- Any other payments and other benefits which are made to trustees under express provisions of the governing document of a charity or in fulfilment of its charitable objectives.
- Serving as a director, officer, trustee, employee or agent etc. of an organisation which provides goods/services to CIMSPA or another charity/non-governmental organisation.
- A holder of 1% or more of the voting power of a charity/NGO.
- Acting as a consultant to an entity which received funds from or gives to CIMSPA or another charity/NGO.

It is, therefore, essential that all CIMSPA's People are fully aware of their duties and responsibilities and that when acting in their role with CIMSPA, they must act solely in the best interests of CIMSPA.

Policy

Register of Interests

The majority of CIMSPA's People and their related parties have a multiplicity of personal, domestic and professional interests, that may, on occasion, compete with those of CIMSPA. CIMSPA's intention is that through consistent, transparent and effective management of registered interests, individuals will be able to be appointed for the knowledge, skills and experience which they bring to CIMSPA, whilst ensuring that any interests are identified and managed, in order to protect CIMSPA and its People.

CIMSPA will notify CIMSPA's People and potential CIMSPA People that they will be expected to register their interests on appointment by CIMSPA and as and when they arise. If any of CIMSPA's People or potential CIMSPA People are concerned over an interest they have registered, they should first consult the Register of Interests Policy. If they are still concerned, they should contact their CIMSPA executive key contact, Chair, or line manager.

CIMSPA asks all its People to register their interests, and those of their related parties, to promote transparency, good governance and reduce the risk of unexpected disclosures. These are recorded through the Register of Interests form and register.

To be effective, CIMSPA's People must register all interests as they commence their role, at an annual review, at Board or committee meetings, during appropriate line management meetings or during any undertaking of their role in which their interests may influence their undertaking, and when any material changes occur.

If CIMSPA's People are unsure what to register, or whether/when registrations need to be updated, the guidance is to err on the side of caution. CIMSPA's People can receive

confidential guidance from CIMSPA's Chief Operating Officer if they wish to discuss an issue further. It remains the responsibility of each individual to notify CIMSPA of any changes to their interests.

In the event a member of CIMSPA's People does not have any interests to declare they must complete the register of interests form at least annually to declare this is the case.

Where CIMSPA's People are connected to a party involved in the supply of a service or product to CIMSPA, this information will be fully disclosed in the annual report and accounts.

Date Protection

The information provided will be processed in accordance with General Data Protection Regulations (GDPR) as set out in the Data Protection Act 2018. Data will be processed only to ensure that CIMSPA's People act in the best interests of the institute. The information provided will not be used for any other purpose.

GDPR governs how CIMSPA processes personal data. A full description of CIMSPA's privacy statement and schedule of retention can be found at <https://www.cimspa.co.uk/privacy>.

Registered interests once submitted to CIMSPA will be accessible to:

- CIMSPA Chair of the Board of Trustees (full register)
- Chair and executive lead for each of CIMSPA committees (register for the relevant committee only)
- CIMSPA's Chief Executive Officer and Chief Operating Officer (full register)
- CIMSPA's Senior Leadership Team (staff register only)
- CIMSPA's Heads of Department (register for the relevant department only)
- CIMSPA's line managers (information for relevant staff only)
- CIMSPA Head of Governance and Compliance (full register)
- CIMSPA Governance Manager (full register)
- CIMSPA Executive Assistant (full register)
- CIMSPA Head of People and Culture (staff register only)
- CIMSPA IT administrators (full register)
- CIMSPA External Auditors (full register)

CIMSPA may also be required to share registered interests with third parties, such as the Institute for Apprenticeships, to support CIMSPA's application to become the End Point Quality Assurance Partner.

CIMSPA's People will be custodians of CIMSPA specific information and will need to adhere to CIMSPA's data protection policies and procedures. Once CIMSPA's People have completed their tenure, contract, or role with CIMSPA, they will be required to safely dispose of any CIMSPA related information.

What to do if CIMSPA's People face a Conflict of Interest

If CIMSPA's People believe that they have a perceived or real conflict of interest, they should:

- Declare the interest at the earliest opportunity
- Withdraw from discussions, actions and/or decisions relating to the conflict.

If CIMSPA's People fail to declare an interest that is known to CIMSPA one of the following will declare that interest

- CIMSPA Chair of the Board of Trustees
- Chair or executive lead of CIMSPA sub-committees
- CIMSPA Senior Leadership Team
- CIMSPA Heads of Department or line managers
- CIMSPA Head of Governance and Compliance
- CIMSPA Governance Manager
- CIMSPA Executive Assistant
- CIMSPA Head of People and Culture
- CIMSPA External Auditors

All decisions under a conflict of interest will be recorded by CIMSPA's executive team, and reported in the minutes of the meeting and / or in the risk assessment if appropriate. The report will record:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage, mitigate or remove the conflict.

Where CIMSPA's People are connected to a party involved in the supply of a service or product to CIMSPA, this information will be fully disclosed in the annual report and accounts.

Actions where Conflicts Arise

If CIMSPA's People have a conflict of interest, they must not be involved in approving, managing, monitoring, awarding, assessing, verifying, quality assuring or any other form of decision making. CIMSPA's governance structure will support the monitoring of arrangements that relate to actions where conflicts may arise, through risk assessment procedures, internal audits, and wider governance from CIMSPA's Audit and Probity Committee.

Where Trustees or Board Sub-committee members have a conflict of interest, they must not be counted in the quorum, participate in in any discussions or vote on the conflicted matter. It

is the responsibility of the Board Chair or Sub-committee Chair to proactively manage conflicts of interest, including ensuring that interests are declared at the start of each meeting.

Gifts and Hospitality

CIMSPA has a separate Declaration of Gifts and Hospitality Policy which outlines CIMSPA's stance on the receipt of gifts and hospitality and the criteria for which CIMSPA's people must declare the receipt of gifts and hospitality.

Accessing the Register of Interests Form

The Register of Interests form must be completed by CIMSPA's People at least annually. However, access to the form is available throughout the year to allow for updates to be made as and when material changes in CIMSPA's People's personal and related party interests occur.

The Register of Interests form can be found [here](#).

Review

The Register of Interests Policy will be reviewed by the Board of Trustees in May 2026, unless changes in policy, governance or other circumstances require a review prior to this date. It will then be reviewed biennially in accordance with the Board's annual plan.





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