

ACF Conflict of Interest Policy			
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Drafted By	Kerry Sargent	Approved by Board on	26/06/2025
Responsible Person	Chair	Scheduled Review Date	26/06/2027

1. INTRODUCTION

The Australian Calisthenics Federation's (ACF) Conflict of Interest Policy ensures transparency and integrity across all levels of governance. It applies to the ACF Board, Staff, and all ACF committees (called "ACF representative" in this policy), outlining procedures to identify, disclose, and manage conflicts to uphold ethical decision-making and maintain trust within the organization. This policy reflects the ACF's commitment to fairness and accountability.

2. PURPOSE

The ACF aim to ensure that all ACF representatives are aware of their obligations to disclose any conflicts of interest that they may have and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of the ACF.

3. SCOPE

This policy applies to the ACF Board of Directors, ACF Staff (paid and volunteers), ACF Standing Committee members, and members of any other ACF Committee.

4. DEFINITION OF CONFLICT OF INTEREST

A conflict of interest occurs when one's personal or professional interests conflict with their responsibility to act in the best interests of the ACF. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder).. A conflict also arises when an ACF representative holds dual responsibilities—balancing their duty to the ACF with obligations to another entity (such as another board, committee, or business).

A **professional conflict of interest** specifically refers to situations where an individual's professional role, affiliations, or external commitments create competing obligations that may influence decision-making within the ACF. This could include:

- **Employment at competing organizations** – Where an individual holds a role in another sporting body or federation that may impact impartial governance or resource distribution.
- **Contractual agreements** – When an ACF representative has financial or professional ties to vendors, sponsors, or service providers seeking to engage with the Federation.
- **Influence over strategic decisions** – When an individual's external professional interests affect governance policies, funding allocations, or committee appointments.

A conflict of interest may be actual, potential, or perceived, and can be financial (involving monetary gain) or non-financial (involving reputational, relational, or political considerations). Effective disclosure, transparency, and appropriate governance measures are essential to maintaining integrity and trust within the Federation.

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

The ACF will manage conflicts of interest by requiring ACF representatives to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage any conflicts of interest; and
- follow this policy and respond to any breaches.

5.1. Responsibility of the Board

The ACF Board is responsible for:

- establishing a system for identifying, disclosing, and managing conflicts of interest
- monitoring compliance with this policy; and
- reviewing this policy regularly to ensure it is operating effectively

The ACF must ensure that ACF representatives are aware of this Policy and that they disclose any actual or perceived material conflicts of interests as required by this policy.

5.2. Identification and disclosure of conflicts of interest

Neither a Director nor responsible officer should allow a conflict of interest to compromise their position as ACF representative within the organisation. An ACF representative's "personal" interests (for example, a shareholding in another company) or other duties (for example, being a committee member of a related entity), their duty to the organisation (of which they are a director) or related party transactions must not be brought into conflict.

ACF representatives need to acknowledge that information will be provided to them which will be considered to be "confidential." "Confidential information" is any information:

- a) determined by the Board or the National Operations Manager (NOM), and so declared by marking "confidential" or by statement agreed by the Board at the time of declaration; or
- b) which may be reasonably considered by the Board to be commercially or otherwise sensitive or likely to be so to the Board.

ACF representatives have a duty not to make unauthorised disclosure or use of ACF information and a duty not to disclose or exploit confidential information, such as commercially or price sensitive information or information which is confidential by virtue of a contractual arrangement.

5.3. Conflict of Interest Declaration Procedure:

For New Board, Staff (Paid & Volunteers), and Committee Members

- Step 1: Induction Process – All newly appointed board, staff, and committee members must complete the ACF Conflict of Interest Declaration Form as part of their onboarding process.
- Step 2: Submission – The completed form is submitted to the National Operations Manager (NOM) within the induction period.
- Step 3: Registration – The NOM files the declared conflicts in the ACF Conflict of Interest Register within one week of submission.

2. For Existing Board, Staff, and Committee Members Who Develop a New Conflict

- Step 1: Identification & Reporting – If a board, staff, or committee member identifies a new conflict, they must complete the ACF Conflict of Interest Declaration Form within one week of identifying the conflict.
- Step 2: Submission – The completed form is submitted to the NOM promptly.
- Step 3: Registration – The NOM updates the ACF Conflict of Interest Register within one week of submission.

Once an actual, potential, or perceived conflict of interest is identified, it must be entered into the ACF Conflict of Interest Register, as well as being raised with the Board. The register must be maintained by the NOM and record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

6. ACTION REQUIRED FOR MANAGEMENT OF CONFLICT OF INTEREST

6.1. Conflicts of Interest of ACF Representatives

Once a conflict of interest has been appropriately disclosed, the Board (excluding the Director disclosing and any other conflicted Director) must decide whether or not the conflicted ACF Representative should:

- vote on the matter (this is a minimum),
- participate in any debate; or
- be present in the room during the debate and the voting.

In exceptional circumstances, such as where a conflict is very significant or likely to prevent an ACF Representative from regularly participating in discussions, it may be worth the board considering whether it is appropriate for the person conflicted to resign from the Board and or Committee.

6.2. What should be considered when deciding what action to take

In deciding what approach to take, the board 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,
- alternative options to avoid the conflict,
- the ACF objects and resources; and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the [organisation].

The approval of any action requires the agreement of at least a majority of the board (excluding any conflicted Director/s) who are present and voting at the meeting. The action and result of the voting will be recorded in the minutes of the meeting and in the register.

7. COMPLIANCE WITH THIS POLICY

If the board has a reason to believe that a person subject to the 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, the board may take action against them. This may include seeking to terminate their position as an ACF Representative.

If a person suspects that an ACF Representative has failed to disclose a conflict of interest, they must notify the Chair who will contact the ACF Representative to discuss the alleged breach of policy.

RELATED DOCUMENTS

The following documents may be used as reference information for the deployment of this policy/procedure:

Reference	Title	Identifier
(1)	ACF Conflict of Interest Register	ACF-088-REG
(2)	ACF Conflict of Interest Declaration Form	ACF-182-FRM
(3)	ACF Governance & Organisational Plan	ACF-092-PLN
(4)	ACF Code of Conduct – Board & Management	ACF-078-POL
(5)	ACF Board Confidentiality Policy	ACF-062-POL

AUTHORISATION

Kerry Sargent

Signature of ACF Chair

Date of Approval by the Board – 26/06/2025

Australian Calisthenics Federation