

 Singapore Swimming Association	Document:	
	Conflict of Interest Policy	
	Revision:	Page: 1 of 8
Prepared on: Date: April 2017	Approved by Executive Committee Date: Sept 2018	

1. Policy Statement

- 1.1. It is Singapore Swimming Association's policy that Executive Committee Members, staff, volunteers and all individuals representing or acting on behalf of Singapore Swimming Association must be free from conflicts of interest that could adversely influence their judgment or objectivity in conducting the Association's activities and assignments.

2. Purpose & Scope

- 2.1. As Representatives of the Association, individuals have an obligation to act in the best interest of the Association. Hence, individuals need to avoid situations where there may be real, potential or perceived conflicts of interest, which may arise where a Representative's personal or family interest conflicts with those of the Association.
- 2.2. Such conflicts may create problems that may result in the following:
- a. Cause damage to the Association's reputation which may lead to its inability to sustain operations;
 - b. Influence the Representatives' judgement and compromise objectivity when conducting the Association's affairs;
 - c. Restrict free discussion, thus resulting in decisions or actions that are not in the interests of the Association; and
 - d. Risk the impression that the Association has acted improperly.
- 2.3. This Policy aims to protect both the Association and its Representatives from any appearance of impropriety.

3. Terms and Definitions.

- 3.1. "Association" refers to the Singapore Swimming Association or SSA.
- 3.2. "Representative" refers to Executive Committee Members, staff, volunteers and all other individuals representing or acting on behalf of the Association.
- 3.3. "Policy" refers to this Conflict of Interest Policy.
- 3.4. "Interest" means any commitment, investment, relationship, obligation, or involvement, financial or otherwise that may influence a person's judgement. This would include:
- a. Direct interest – ownership in the name of the Representative;
 - b. Indirect interest – ownership beneficially held through another investment, estate, trust or another intermediary;
 - c. Vested interest – personal stake or involvement, which may or may not include an expectation of financial gain; and
 - d. Deemed interest – a Representative is deemed to have an interest which his/her immediate family member holds an interest.

Document: Conflict of Interest Policy	Revision:	Page: 2 of 8
---	-----------	------------------------

3.5. A conflict of interest arises when the personal interests of the Representative may potentially interfere with the performance of his/her duties in the Association. When actual, potential or perceived conflict of interest arises, the integrity, objectivity and accountability of the person may be affected, which could impede the best interest of the Association.

4. Declaration of Interests

4.1. Given the stated purpose of this Policy, Representatives must:

- a. Declare their interests, and any gifts or hospitality received in connection with their role in the Association; and
- b. Declare when the transaction to be effected may result in a conflict of interest.

4.2. A declaration of interests' form is provided for this purpose. The types of interest to be declared will include, but is not limited to the following:

- a. Representatives who have friends or other personal or business relationships must carefully consider whether those relationships create conflicts of interest with their entrusted role in the Association. Examples include:
 - i. hiring a relative or friend as an employee or vendor;
 - ii. buying or selling goods or services from/to a family business for which others might compete;
 - iii. having a personal relationship where there is an immediate reporting relationship;
 - iv. volunteering and/or having memberships in any other Associations/charities; or
 - v. receiving goods/services as beneficiaries.
- b. Representatives must disclose any outside activities, financial interest or relationships that may pose a real, potential or perceived conflict of interest. Disclosures are to be made to the Executive Committee and Executive Director, with the required approval obtained before accepting any position as an officer or director of an outside business.

4.3. To be effective, the declaration of interests needs to be updated in written form at least annually and also when any changes occur.

4.4. In situations where Representatives are not sure what to declare, or whether/when your declaration needs to be updated, they are strongly encouraged to err on the side of caution or seek advice from the Executive Committee.

4.5. All disclosure of interest made by Representatives and decisions made by the Executive Committee of the Association on such matters must be recorded, updated and filed with the head of the Human Resources Department (or his designee). Upon receiving notice from the conflicted member, Human Resources Department should disseminate the information to the Executive Committee as soon as practicable.

4.6. A register of interests shall also be used to record all gifts of a value over S\$200 received by Representatives. The receipt of gifts in the form of cash/monies is strictly prohibited. Representatives should exercise prudence and refrain from accepting gifts inappropriately that may be construed as having a potential to influence decisions made by the

Document: Conflict of Interest Policy	Revision:	Page: 3 of 8
---	-----------	------------------------

Representative.

5. Operating Procedures

- 5.1. If the Representative is placed in a position of power to influence decision on an issue where he/she has an interest, it is the responsibility of the Representative to:
- a. Identify the potential conflict of interest;
 - b. Offer to withdraw or absent himself from the meeting; and
 - c. Not vote on the issue.
- 5.2. If the Executive Committee or any sub-committee needs to make a decision on an issue where a relevant Representative(s) has/have an interest, it is the responsibility of the Executive Committee/sub-committee to ensure that:
- a. All decisions are made by vote, with a two-thirds majority required based on the presence of a quorum;
 - b. A resolution is passed highlighting that the Interested Representative may be present in the discussions (if needed);
 - c. Interested Representatives must not vote on matters affecting their own interests;
 - d. Interested Representatives are recused from the meeting during the voting process.
- 5.3. It is the responsibility of the Executive Committee/sub-committee to:
- a. Only decide to hire or contract with any vendor if they are the best qualified individuals available, and willing to provide the goods or services needed at the best price. The Executive Committee/sub-committee's decision shall not be influenced in any way by the fact that relevant Representative has an interest in the contract.
 - b. Record in the minutes of the Executive Committee/Sub-Committee Meeting the potential conflict of interest, and the use of the procedures and criteria of this policy.
- 5.4. It is the sole responsibility of any Representative of the Association to report any possible real, potential or perceived conflict of interest. If it is an oversight of the Association, the Representative shall promptly inform the Association that he/she has been put in such a position of conflict of interest.
- 5.5. No Representative of the Association shall derive any personal profit or gain, directly or indirectly, by reason of his or her participation with the Association. Each individual shall disclose to the Association any personal interest which he or she may have in any matter pending before the Association and shall refrain from participation in any decision on such matter.
- 5.6. Any Representative of the Association shall refrain from obtaining any list of clients for personal or private solicitation purposes at any time during the term of their affiliation.
- 5.7. The Executive Committee of the Association shall have the right to suspend any involvement of any Representative when it has come to their attention that a potential, actual or perceived conflict has arisen, but has not been voluntarily disclosed by the relevant individual.

Document: Conflict of Interest Policy	Revision:	Page: 4 of 8
---	-----------	------------------------

5.8 Executive Committee Members shall serve without any remuneration for their voluntary service to SSA so as to maintain the integrity of serving for public trust and community good instead of personal gain. However, SSA shall reimburse Executive Committee Members for out-of-pocket expenses directly related to the service.

6. Violations

6.1 Suspected violations to this Policy should be communicated to the President or Executive Director. If the suspected violations involve the President or Executive Director, they should be communicated to the Chairman of the Audit & Compliance Committee.

6.2 Any violation will result in discipline, up to and including termination from employment or removal from the Executive Committee, or expulsion from being a Representative of the Association.

- END -

**SINGAPORE SWIMMING ASSOCIATION
CONFLICT OF INTEREST DECLARATION FORM**

With regard to my service as [Executive Committee / staff / volunteer / other representative] member of Singapore Swimming Association, this is to declare that I, except as described below, am not now nor at any time during the past year have been:

- 1) A participant, directly or indirectly, in any arrangement, agreement, investment, or other activity with any vendor, supplier, or other party doing business with the Singapore Swimming Association, which has resulted, or could result in a personal benefit to me.
- 2) A recipient, directly or indirectly, of any salary payments or loans or gifts of any kind or any free service or discounts or other fees from or on behalf of any person or organisation engaged in any transaction with the Singapore Swimming Association.

Any exceptions to (1) or (2) are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have (or had during the past year) in the persons or organisations having transactions with the Singapore Swimming Association.

I would like to report the following potential conflict of interest:

➤ **I am affiliated* to the following charities or organisations:**

1) Name of Company: _____
 Type of Company: Public-listed / Private Limited / Sole Proprietorship / Partnership / Others: _____
 Nature of Business: _____
 Role/Capacity: _____

2) Name of Company: _____
 Type of Company: Public-listed / Private Limited / Sole Proprietorship / Partnership / Others: _____
 Nature of Business: _____
 Role/Capacity: _____

3) If you have more than 2 affiliations, please provide details below.

➤ **I am affiliated* to the following Ordinary or Associate Members of the Association:**

1) Name of Company: _____
 Type of Company: Public-listed / Private Limited / Sole Proprietorship / Partnership /
 Others: _____
 Nature of Business: _____
 Role/Capacity: _____

2) Name of Company: _____
 Type of Company: Public-listed / Private Limited / Sole Proprietorship / Partnership /
 Others: _____
 Nature of Business: _____
 Role/Capacity: _____

3) If you have more than 2 affiliations, please provide details below.

➤ **I am affiliated* to any vendor, supplier, or any other party providing or bidding for providing services, having a direct or indirect interest in any business transaction(s), agreement, or investment:**

1) Name of Company: _____
 Nature of Business: _____
 Nature of Interest: _____
 Role/Capacity: _____

2) Name of Company: _____
 Nature of Business: _____
 Nature of Interest: _____
 Role/Capacity: _____

3) If you have more than 2 affiliations, please provide details below.

➤ **I have business dealings or transactions with a vendor, supplier or any other party which could result in benefit to me:**

1) Name of Companies: _____
 Nature of Businesses: _____
 Nature of Interest: _____

2) Name of Companies: _____
 Nature of Businesses: _____
 Nature of Interest: _____

3) Others; please provide details below.

➤ **I am affiliated* to another Representative involved in Singapore Swimming Association.**

1) Name of Representative: _____
 Role of Representative: _____
 Nature of Relationship: _____

2) Name of Representative: _____
 Role of Representative: _____
 Nature of Relationship: _____

3) If you have more than 2 affiliations, please provide details below.

➤ **Any other real, potential or perceived conflicts of interest. Please provide details below.**

**Affiliated refers to being connected to another party who could be one of the following: immediate family members or close associates; any corporation, business or non-profit organisation of which you serve as staff, officer, board member, partner, participate in management or are employed by; any trust or other estate in which you have a substantial interest or as to which you serve as a trustee or in a similar capacity.*

(Please tick)

- I hereby confirm that the disclosures made above are complete and correct to the best of my information and belief.
- I shall not participate in the discussion and decision-making of any matter in question which I have a real, potential or perceived conflict of interest.
- I will notify the Executive Committee and/or the Executive Director immediately if I come to know that this disclosure is inaccurate or that I have not complied with this conflict of interest policy.

Name: _____

Designation: _____

Signature: _____

Date: _____

Note: This Conflict of Interest Declaration Form has been adopted and amended from the Financial Governance for Charities (supported by the Social Service Institute).