

ENCOURAGING
EXCELLENCE,
NURTURING
TALENT!



**SPORTING
CHANCES
GROUP**

CONFLICT OF INTEREST POLICY

Lead	David Johnson
Last Reviewed	November-2025
Next Review Date	November-2026

To be reviewed **annually**.

This policy is enforced across **all** Sporting Chances Group provisions.



SC OUTREACH
PROGRAMME



MINI



CREATIVE
HAIR&LASHES



SC ONLINE
MENTORING
PROGRAMME



FITNESS
ACADEMY



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TERMINOLOGY DISCLAIMER

When the terms *'employee'*, *'staff member'*, *'staff'*, *'team'*, *'team member'*, *'you'*, *'your'*, *'yours'*, or *'they'* are used in this document and in all Sporting Chances Group (SCG) documentation this is pertaining to self-employed staff, the individual contractor, collective contractors, and volunteers. When you sign this document, you are signing this document to say that you understand that you are a self-employed contractor irrespective of what term is used to describe you.

1. SCOPE

A conflict of interest policy is required by all organisations to ensure good governance and the ability to control potential conflicts of interest that may arise from time to time.

Directors and staff have a legal obligation to act in the best interests of Sporting Chances Group (SCG) and in accordance with SCG's governance documents, and to avoid situations where there may be a potential conflict of interest. These potential conflicts include both conflicts of interest which relate directly to SCG, and any scenario in which it is reasonably foreseeable that any such conflict of interest will arise in the future.

Conflicts of interests may arise where an individual's commercial, personal or family interests and/or loyalties conflict with those of SCG. **Such conflicts may create problems;**

they can for example:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of SCG and its students
- Risk the impression that SCG has acted improperly



2. PURPOSE

The aim of this Policy is to clarify the way actual and perceived conflicts of interest will be managed and addressed in accordance with Companies Acts, and the Conditions/Principles of Recognition issued by the Regulatory Authorities from time to time.

It should be noted that the benefit derived by directors, management and staff should not be different to that received by any other person. A conflict would arise where this is not or is not seen to be the case.

This policy applies to directors, management, staff and any person acting as an 'agent' on behalf of SCG.

If you are a user of SCG's services, or the carer of someone who uses SCG's services, you may be covered under the Policy, dependent on circumstances. If you are uncertain, seek advice.

SCG's directors, management, and staff have an obligation, under The Companies Act, to act in the best interest of the Group, and in accordance with its governing documents, and to avoid situations where there may be a potential conflict of interest.

(A) GUIDANCE

You should not, directly or indirectly, engage in, or have any interest, financial or otherwise, in any other business enterprise which interferes or is likely to interfere with your independent exercise of judgement in SCG's best interest.

Generally, a conflict of interests exists when an employee is involved in an activity:

- Which provides products or services directly to, or purchase products or services from SCG
- Which subjects the employee to unreasonable time demands that prevent the employee from devoting proper attention to his or her responsibilities to SCG
- Which is so operated that the employee's involvement with the outside business activity will reflect adversely on SCG

Should you be in doubt as to whether an activity involves a conflict, you should discuss the situation with your Manager and refer to the *Conflict of Interest Policy*.



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(i) Relationships

SCG Staff/ Contractors/ Volunteers are expected to maintain the highest standards of professional and respectful relationships with all parents and children. **This includes:**

- **Open and honest communication** - Staff should communicate with parents/guardians, young people and professionals clearly and respectfully, addressing any concerns promptly and professionally.
- **Confidentiality** - SCG Staff must maintain the confidentiality of student information and respect the privacy of families.
- **Appropriate Boundaries** - Staff must at all times and in all circumstances, maintain the highest standards of professional conduct and uphold appropriate boundaries with parents/guardians, young people and professionals. This includes strictly avoiding any personal or social relationships that could potentially compromise their professional responsibilities or bring the SCG's reputation into disrepute. These boundaries extend to all forms of communication, both in-person and online (including SMS messaging and WhatsApp). Any relationships in person or online with colleagues should be declared to management (including SMS messaging and WhatsApp).
- **Child protection** - Staff have a legal and ethical responsibility to safeguard the welfare of all children. Any concerns regarding child protection must be reported immediately through the SCGs designated procedures.

(ii) Receipt of Gifts

Your working relationships may bring you into contact with external professionals, Parents/ Guardians, young people and outside organisations where it may be normal behaviour or business practice or social convention to offer hospitality, and sometimes gifts. Offers of this kind to you or your family can place you in a difficult position. Therefore, no employee/ contractor/volunteer or otherwise or any member of his or her immediate family should accept from a parent/guardian, professional, client, outside organisation, young person, customer or other person doing business with or attending SCG, payments of money under any circumstances, or special considerations, such as discounts or gifts of materials,



equipment, services, facilities, or anything else of value **unless:**

- They are in each instance of a very minor nature usually associated with accepted practice
- They do not improperly interfere with your independence of judgement or action in the performance of your employment
- In every circumstance where a gift is offered, the advice of your Line Manager must be immediately sought and the gift declared no matter how small it is deemed to be



3. DECLARATION OF INTERESTS

SCG's directors, management and staff are to sign up to the Conflicts of Interest Policy.

This means we are asking people to:

1. declare their relevant interests, as they know them at the time of signing the Declaration of Interest. The Register of Interests Form is to be completed to achieve this. It lists the types of interest you should declare; and
2. commit to report that a conflict of interest, actual or perceived, has arisen whilst working with SCG, or on its behalf, and that SCG needs to be aware of the specific circumstances of this in order to effectively manage the conflict.

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

If you are not sure if you should declare a potential conflict of interest, declare it anyway. If you would like to discuss this issue, please contact the SCG Managing Director for guidance.

The register of interests shall also be used to record all gifts with a value of over £100 received by SCG directors, management, and staff.

4. DATA PROTECTION

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that SCG's directors, management, and staff act in the best interests of SCG and its students. The information provided will not be used for any other purpose.

Please see separate [*Data Protection Policy*](#).



5. WHAT TO DO IF YOU FACE A CONFLICT OF INTEREST?

SCG's directors, management, and staff should declare any conflict of interest at the earliest opportunity.

You may do this by reporting this to your line-manager.

Dependent on the relevant circumstances you will need to withdraw from any subsequent activity, discussion or meeting that could be affected by the conflict of interest.

You may participate in discussions from which you may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal, or where there is a 'community of interests.'

Where further action is considered necessary the specific circumstances of the conflict of interest will be discussed at a formal meeting of the Senior Leadership Team (SLT). Depending on the circumstances, it may be relevant for the staff member in question to be present at this meeting. All decisions under which a conflict of interest has been declared will be recorded by the Company Secretary and reported in the minutes of the relevant SLT meeting.

The report will record:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage the conflict

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.



If you have a conflict of interest, you must not be involved in the development, delivery or invigilation of the relevant qualifications or unit, unless it has been agreed with the Managing Director and the Qualification board that the conflict is effectively managed.

If you have a conflict of interest relating to the assessment of a student - specifically a personal interest in the result of the assessment - you must not be involved in such assessment. Where an assessment by you cannot be avoided, SCG will arrange for the relevant part of the assessment to be subject to scrutiny by another person.

6. REPORTING CONFLICTS OF INTEREST

All conflicts of interest (COI) forms and conflicts, as they arise, are to be reported to the Managing Director, David Johnson.

REPORTING PROCESS

1. All new members of staff will be required to complete the COI form during their induction process.
2. Managers, staff, and contractors are required to declare conflicts of interest on an annual basis.
3. The COI form must be completed and returned within 10 working days from the date of issue.

All COI forms will be reviewed by the Managing Director against the risks identified. High risk conflicts will be further reviewed by the SLT as to the implications for organisational risk.



APPENDIX 1: SCG CONFLICTS OF INTEREST / REGISTER OF INTERESTS DECLARATION FORM

CONFLICTS OF INTEREST / REGISTER OF INTERESTS DECLARATION FORM

I confirm that I have read and understood the Sporting Chances Group's *Conflict of Interest Policy* and will comply with the guidance and procedures as outlined.

I will ensure that:

1. The register of interest is updated to record all the conflicts of interest I may have.
2. Conflicts of interest, actual or perceived, that may arise whilst working with Sporting Chances Group, or on its behalf, will be reported at the earliest opportunity.

Full Name	
Signature <i>(can be typed)</i>	
Date <i>(dd/mm/yyyy)</i>	

The Conflicts of interest/Register of Interests, Interests and Gifts will be recorded on the company's Register of Interest, which can be inspected by making a request to do so in writing to the Company Director. The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that trustees and senior staff act in the best interests of Sporting Chances Group. The information provided will not be used for any other purpose.



APPENDIX 2: SCG DECLARATION OF INTERESTS FORM



DECLARATION OF INTERESTS FORM

I am a:

Director

Employee

Contractor

...of Sporting Chances Group (SCG). My interests have been set out in accordance with the company's *Conflict of Interest Policy*.

Category of interest	Details of the interest	Does this interest apply to yourself or a member of your immediate family, connected persons or some other close personal connection? Please state name of individual(s) if interest refers to someone other than yourself.
Employment Current employment and any previous employment in which you continue to have a financial interest.		
Appointments - Voluntary e.g.: trusteeships, directorships.		
Appointments - remunerated e.g.: paid trusteeships, directorships.		
Memberships of any professional bodies, special interest groups or mutual support organisations.		
Investments in unlisted companies, partnerships and other form of business, major shareholdings (e.g. more than 1%) and beneficial interests.		



Gifts or hospitality offered to you by external bodies whether this was declined or accepted in the last 12 months.		
Any association with examination boards or awarding institutions.		
Involvement with SCG's competitors and suppliers.		
Any other conflicts not covered by the above.		

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give consent for it to be used for the purposes described in the *Conflict of Interest Policy* and no other purpose.

Full Name	
Signature <i>(can be typed)</i>	
Date <i>(dd/mm/yyyy)</i>	