



April 2017

PAN AMERICAN HOCKEY FEDERATION
CONFLICT OF INTEREST/CONFIDENTIALITY
POLICY AND GUIDELINES

1. SCOPE OF APPLICATION

This Policy applies to Pan American Hockey Federation (PAHF) Board of Directors (the Board) and PAHF Committee and Panel members as defined in the PAHF Statutes and to staff or consultants employed by the PAHF.

2. POLICY STATEMENT

A member of the Board or a Committee or a Panel, as the case may be, shall not participate in any discussion on any subject brought before the Board or a Committee or a Panel for consideration and decision if that member has or may have, directly or indirectly, an interest in the outcome of the consideration and decision of that subject without first declaring the conflict of interest and may not vote on any such subject.

Members of staff or consultants employed by the PAHF are to avoid actual or potential, present or future conflicts between personal interests and official duty or work related activities.

3. DETERMINING WHAT IS A CONFLICT OF INTEREST

A conflict of interest is considered to exist:

- in any situation where the personal or business interests of a Board/Committee/Panel/staff or consultant member may influence his/her ability to put the interest and welfare of the PAHF before personal or business interests or where someone is likely to perceive that the Board/Committee/Panel/staff or consultant member could be influenced.
- whenever an individual can benefit directly or indirectly from information received by, or a decision of the Board/Committee/Panel or where someone might reasonably perceive there to be such a benefit.
- when an individual has two separate and competing interests and it is unclear as to which interest he/she is acting for.

Page 1 of 6

PAHF CONFLICT OF INTEREST/CONFIDENTIALITY POLICY AND GUIDELINES – April 2017



4. COMMON INSTANCES OF CONFLICT OF INTEREST

In assessing the situations described in Paragraph 3 above, direct as well as indirect interests must be taken into account. This also includes the interests of a third person such as a parent, spouse, relation or dependent.

The following non-exhaustive list shows examples of common instances of conflict of interest:

- Where Board or Committee or Panel members or staff or consultants have personal interests in business transactions or contracts that the PAHF may enter into.
- Where Board or Committee or Panel members or staff or consultants have an interest in other organizations that have dealings or relationships with the PAHF and when matters involving the interest of both the PAHF and the other organization are being considered.
- Where Board or Committee or Panel members or staff or consultants have interests in any joint ventures with external parties which the PAHF may enter into.
- In recruiting staff with close relationships (i.e. those who are more than acquaintances) with current Board, Committee, Panel or staff or consultant members.
- Any employment or income received from work undertaken within sport.
- Any income received from sport as a partner, director or employee within a firm or company.
- Any sponsorship personally received.
- Any contracts with a sport for the provision of services or goods for profit.

5. DEALING WITH CONFLICTS OF INTEREST

5.1 General Principles

It is the personal responsibility of each person to avoid any case of conflict of interest.

Faced with a situation of an actual or potential conflict of interest, the person concerned must disclose the actual or potential conflict of interest to the Board, the Committee or Panel concerned or, if a staff member or consultant, to the President.

Pending determination of the question, the person concerned must refrain from expressing any opinion, participating in any discussion or from voting on any subject until the question is finally determined as provided in the following sub-paragraphs.

5.2 Board Members

If the person concerned is a Board member, the Board is responsible, in the first instance, for taking a decision concerning the management of the conflict of interest.



If the Board cannot reach a decision, the Board must refer the case to the FIH for a determination in accordance with the FIH Rules concerning Conflicts of Interests.

5.3 Committee or Panel Members

If the person concerned is a Committee or Panel member, the Committee or Panel is responsible, in the first instance, for taking a decision concerning the management of the conflict of interest.

If the Committee cannot reach a decision, the Committee or Panel Chair must refer the case to the Board for resolution.

If the Board cannot reach a decision, the Board must refer the matter to the FIH for determination in accordance with the FIH concerning Conflicts of Interests.

5.4 Staff Member or Consultants

If the person concerned is a staff member or a consultant, then the President and the Human Resources Committee are responsible, in the first instance, for taking a decision concerning the management of the conflict of interest.

If the President and the Human Resources Committee cannot reach a decision, the President must refer the matter to the Board for determination.

5.5 Decision Final

In any matter referred to:

- The FIH under paragraphs 5.2 or 5.3, or
- the Board under paragraph 5.4,

The decision of the FIH or the Board, as the case may be, shall be final and binding on the PAHF and the person(s) concerned and there shall be no further appeal.

6. DECLARATION OF INTEREST

Immediately following their election, appointment or commencement of employment, as the case may be, every Board, Committee, Panel and staff member or consultant shall declare in writing all business, sport or other personal interests which may result in a conflict of interest, actual or potential, in the discharge of their responsibilities as Board, Committee, Panel, staff members or consultants. The Declaration shall be in the form annexed as Schedule A.

If at any time following the filing of his or her Declaration there occurs any material change in the information contained in the Declaration given by a Board, Committee, Panel, staff or consultant, that Board, Committee, Panel, staff or consultant shall file a supplementary Declaration describing such change as soon as reasonably possible

A Register of the business, sport and other personal interests as declared by all Board, Committee, Panel members, staff and consultants, which may conflict with the discharge of their responsibilities as Board, Committee, Panel members, staff



or consultants will be maintained by the PAHF Managing Director and updated if a supplementary Declaration is filed by any Board, Committee, Panel member, staff or consultants.

The Register will be made available at the PAHF Office for inspection by any member of the Board or any other person authorized by the Managing Director.

7. CONFIDENTIALITY

All discussions at meetings of the Board of Directors, Committees and Panels are confidential. Members of the Board and members of Committees and Panels must not disclose any discussions that take place at meetings to any third parties.

The official record of all meetings of the Board, Committees and Panels are the minutes of those meetings.

The Chairs of the Committees and Panels are responsible to and report to the Board on all deliberations and discussions that take place at meetings of their respective Committees or Panels.

All official announcements, statements and correspondence (in all forms) on behalf of the PAHF may only be made by the President, or any other person authorized **by them** to do so.



SCHEDULE A

PAN AMERICAN HOCKEY FEDERATION

CONFLICT OF INTEREST

DECLARATION

PREAMBLE

- PAHF has adopted a Conflict of Interest/Confidentiality Policy and Guidelines (“Policy”) – a copy is attached. The Policy applies to all members of the Board, all members of Committees and Panels, all staff of the PAHF, and consultants to the PAHF.
- All persons to whom the Policy applies are required to recognize and avoid participation in any activities that involve, might appear to involve or could result in a conflict of interest, actual or potential.
- All persons to whom the Policy applies must also ensure compliance with the provisions of the Policy with respect to Confidentiality.
- A conflict of interest is defined in paragraph 3 of the Policy.
- Details of the person making this declaration are contained in the Schedule.

DECLARATION

I the undersigned **DECLARE** as follows:

- I have read, understand and accept the Policy.
- I do not have nor do I presently anticipate having any conflict of interest, actual or potential, other than as set out in the Schedule.
- I agree to make immediate disclosure of any actual or potential conflict of interest arising after the date of this declaration.
- I agree to be bound by the decision of the person or body authorized to make decisions under the Policy.



SCHEDULE

Name (in full):.....

Address:.....

Position held:

Details of Conflict of Interest (actual or Potential):

.....

Signature:

Date:.... / / 20 ...