

## Good practice examples for managing conflicts of interest in sport organisations

A key element for ensuring the integrity of sport organisations and reinforcing their role of sport values' catalysts is their protection from corruption, which starts by ensuring the highest level of integrity in their processes. In this context, the development and implementation of appropriate conflict-of-interest<sup>1</sup> policies are essential to mitigate the risk that the processes are unduly influenced as well as to reinforce the public trust in the integrity of sport organisations.

In sport organisations, conflicts of interests may arise frequently. The existence of a conflict of interest is not an offence in itself. However, it is important that these organisations have rules and mechanisms in place to manage these situations and to avoid any inappropriate influence in the decision-making processes of the sport organisation, or the appearance thereof. Such standards shall apply to international sport organisations, as well as to national sport organisations, in particular when the latter benefit from public resources.

<sup>1</sup> At its simplest, a conflict of interest is a situation where a person has an interest that could improperly influence their judgement and decision making. Definitions from international instruments include the following:

<sup>- &</sup>quot;A conflict of interest involves a conflict between the public duty and the private interest of a public official, in which the official's private-capacity interest could improperly influence the performance of their official duties and responsibilities." (OECD, Recommendation of the Council on OECD Guidelines for Managing Conflict of Interest in the Public Service, 2003).

<sup>- &</sup>quot;Conflict of interest arises from a situation in which the public official has a private interest which is such as to influence, or appear to influence, the impartial and objective performance of his or her official duties". (Council of Europe, Recommendation No. R (2000) 10 of the Committee of Ministers to Member States on codes of conduct for public officials, 2000).

<sup>- &</sup>quot;Each State Party shall endeavour, where appropriate and in accordance with the fundamental principles of its domestic law, to establish measures and systems requiring public officials to make declarations to appropriate authorities regarding, inter alia, their outside activities, employment, investments, assets and substantial gifts or benefits from which a conflict of interest may result with respect to their functions as public officials". (UNODC, United Nations Convention against Corruption, 2003).

In 2017, the International Partnership Against Corruption in Sport (IPACS) set up a Task Force to address integrity issues related to the selection processes of major sporting events. As initial focus of the Task Force, it was decided to facilitate a common understanding amongst sport organizers, governments, and international organizations alike on the risks of conflict of interest situations throughout the selection process and how to manage them. The first report of this Task Force released in 2018 considered conflicts of interest situations which may arise in international sport organisations and proposed a number of recommendations to manage them based on a stocktake of existing practices in international sport organisations and international standards.2

Building on this work, the IPACS Steering Committee asked the Task Force to elaborate a document supporting the implementation of the IPACS Task Force 2 report's recommendations through practical guidance, such as examples and tools, which could help sport organisations to put measures in place to manage conflict of interest situations. For this purpose, the present document presents with a number of good practices and examples for each of the recommendations provided by 11 International Federations/sport organisations<sup>3</sup>, the High Authority for transparency in public life (HATVP), the Paris 2024 Organising Committee for the Olympic and Paralympic Games and the International Olympic Committee. The document also proposes a number of tools deriving from the work developed by international organisations for public sector organisation to the extent they are relevant and applicable to the context of sport organisations. The elements included in the following table are not exhaustive and have been selected for the sole purpose of illustration. In this sense, the list is intended to be updated on a six-month basis to allow sport organisations to propose the Task Force additional inputs relating to their current or future conflict of interest policies.

<sup>&</sup>lt;sup>2</sup> https://stillmed.olympic.org/media/Images/Ipacs/PDF/task-force/IPACS\_TF2\_report.pdf.

<sup>&</sup>lt;sup>3</sup> The following organisations' conflict-of-interest policies have been taken into consideration for the creation of this table (listed in alphabetical order): Commonwealth Games Federation (CGF), Fédération Equestre Internationale (FEI), Fédération Internationale de Football Association (FIFA), Fédération Internationale de Ski (FIS), Fédération Internationale de Volleyball (FIVB), International Netball Federation (INF), International Orienteering Federation (IOF), Union Cycliste Internationale (UCI), World Athletics, World Flying Disc Federation (WFDF), World Sailing.

Item	Recommendation	Good practices / Illustrating examples	Tools
1.1	Sport organisations should have published:  a. a conflict-of- interest policy, which sets out its scope of application (e.g., to whom it applies); b. the procedures that should be followed; c. the different risks and examples of situations where conflicts of interest may arise.  (This recommendation is prioritized because it is aimed at regulating and thus, providing for any situation of conflict of interest that may arise in a sport organisation)	World Sailing Conflicts of Interest – World Sailing Policy World Sailing policy on Conflicts of Interest – Articles 1, 4, 7  World Athletics Conflicts, Disclosures and Gifts Rules  Example: Non-exhaustive list of examples:  Examples of Interests in which a Conflict of Interest could arise with the duties owed to World Athletics, and where an Interest therefore becomes a Significant Interest if not otherwise meeting the definition of Significant Interest, include holding a position as an employee, contractor, director, trustee, shareholder, or partner in an Entity or Organisation which is in a contractual relationship with World Athletics (such as a supplier, sponsor or broadcaster) or with any Entity, Organisation or person likely to benefit from the assistance of World Athletics, such as anybody seeking subsidies, dividends, funding or approvals from World Athletics, selection as a host city for World Athletics Series Events, or election or appointment as a World Athletics Official.  [Conflicts, Disclosures and Gifts Rules – Article 5.3]  International Olympic Committee (IOC) IOC Code of Ethics	Checklist for Identifying "At- risk" Areas for Conflict of Interest <sup>4</sup>

<sup>&</sup>lt;sup>4</sup> OECD (2005), Managing Conflict of Interest in the Public Sector: A Toolkit, OECD Publishing, Paris, <a href="https://doi.org/10.1787/9789264018242-en">https://doi.org/10.1787/9789264018242-en</a>.

Item	Recommendation	Good practices / Illustrating examples	Tools
		IOC Rules concerning Conflict of Interest affecting the behaviour of Olympic Parties – p. 30-32	
		Paris 2024 Organising Committee for the Olympic and Paralympic Games (OCOG)  Best Practice Guide  Best practice Guide by Paris 2024 OCOG, Preventing Conflicts of Interest – p. 5-7	
		Fédération Internationale de Football Association (FIFA)  FIFA Code of Ethics  FIFA Code of Ethics (version 2020) – Article 19	
		Example:  [FIFA Compliance Pocket Guide, Conflict of Interest – p. 4]	
		International Orienteering Federation (IOF)  IOF Statutes, Codes and Policies  (click on the link "Conflict of Interests Policy")  IOF Conflict of Interests policy	
		World Flying Disc Federation (WFDF)  WFDF Rules and Policies  (click on the link "WFDF Conflict of Interest Policy")  WFDF Conflict of Interest Policy	

Item	Recommendation	Good practices / Illustrating examples	Tools
1.2	Within the process of awarding a major sports event, sport organisations have a published policy to manage conflicts of interest or the main conflicts-of-interest policy applies to national federations/ other entities which bid for events.	International Olympic Committee (IOC)  IOC Code of Ethics IOC Future Host Elections Rules of conduct for continuous dialogue – Article 1, p. 33  Olympic Charter Olympic Charter – By-law to Rule 18, Article 5.1, p. 44  IOC Future Host Commission Terms of Reference IOC Future Host Commission Terms of Reference with Rules of Conduct (2019) – Appendix 1, p. 8	
		Fédération Internationale de Football Association (FIFA)  2026 FIFA World Cup Bidding Regulations  FIFA Regulations for the selection of the venue for the final competition of the 2026 FIFA World Cup <sup>TM</sup> – Articles 4.2, 5, 6, Clause 9 of Appendix 1  Fédération Internationale de Volleyball (FIVB)  Invitation for Bid – Terms & Conditions  FIVB Invitation for Bid, Terms and conditions (Conflicts of Interest) – Article 1.11, p. 4	
		World Athletics  Event Bidding Rules Conduct of Candidate Cities  World Athletics Rules on Event Bidding – Article 8	

Item	Recommendation	Good practices / Illustrating examples	Tools
2.	The conflict-of-interest policy should cover the concepts of actual, potential and perceived/apparent conflicts and provides clear actions to be taken.	Fédération Equestre Internationale (FEI) Internal Regulations of the FEI FEI Rules on Conflicts of Interest – p. 25  Fédération Internationale de Football Association (FIFA) FIFA Code of Ethics FIFA Code of Ethics (version 2020) – Article 19.3	<ul> <li>Conflict of interest definitions from international instruments<sup>5</sup></li> <li>Risk assessment methodology<sup>6</sup></li> </ul>
	(This recommendation is essential to point out and distinguish between the different concepts of conflict of interest and the different types of behaviour that should be	<ul> <li>Real conflict of interest: "A line manager responsible for the evaluation of a team member is a relative of that team member</li> <li>Potential conflict of interest: "A FIFA team member would potentially be involved in the decision process for a job offering for which a relative or a close friend may be interested to apply."</li> </ul>	

A standard risk assessment methodology can be applied to assess the risk of perception of a conflict.

The probability that a situation could be perceived as a conflict can be measured against its likelihood and impact, each rated for example from low, medium to high. The *likelihood* of a perceived conflict affecting an Official can be conditioned to several parameters: 1) the relative importance of the secondary interest vs the primary interest (taken as the Official's role in the sport organisation); 2) the relative importance of the Sport organisation's decision over the Official's secondary interest; 3) public perceptions about the Decision and its importance; 4) the availability of information such as negative news coverage directly relevant to the Person's track-record and reputation.

The *impact* can be conditioned to the following parameters: 1) the degree of secrecy applied by the Sport Organisation's around its means and resources to detect, avoid and monitor actual conflicts of interest 2) the track-record of the organisation in genuinely enforcing Conflict Rules 3) the level of damage of conflict allegations over the decision 4) the constraints on the organisation to demonstrate whether there is any actual conflict in the specific case (source: World Athletics).

<sup>&</sup>lt;sup>5</sup> See ft. no. 1.

<sup>&</sup>lt;sup>6</sup> A number of Conflicts of Interest policies distinguish real or actual conflicts from perceived conflicts. The latter requires a proper method to assess the risk that a situation is indeed perceived as a conflict. Perception is understood as the unbiased opinion of an independent observer with access to only partial information about a specific situation.

Item	Recommendation	Good practices / Illustrating examples	Tools
	adopted in each of the situations)	Perceived conflict of interest: "A significant supplier contract was awarded to a relative of a FIFA team member leading to the perception from the outside world that favouritism occurred."  [FIFA Compliance Pocket Guide, Conflict of Interest – p. 4]	
		International Olympic Committee (IOC)  IOC Code of Ethics  IOC Rules concerning Conflict of Interest affecting the behaviour of Olympic Parties – Article 2, p. 30-31	
3.	The policy should cover all types of relevant interests, such as financial, professional, political, business or	International Olympic Committee (IOC)  IOC Code of Ethics  IOC Rules concerning Conflict of Interest affecting the behaviour of Olympic Parties – Article 3, p. 31	
	personal/family interests, as well as provide clarity regarding nationality or institutional	Fédération Internationale de Football Association (FIFA)  FIFA Code of Ethics  FIFA Code of Ethics (version 2020) – Article 19.2	
	interest/loyalty.  (It is necessary that the different types of conflict	2026 FIFA World Cup Bidding Regulations FIFA Regulations for the selection of the venue for the final competition of the 2026 FIFA World Cup™ − Articles 3.6 and 4.2	
	of interest be defined in the rules because this provides the concerned persons with clarity on the situations to which	<ul> <li>Example:</li> <li>"The most common examples of conflicting situations are:</li> <li>Outside employment</li> <li>Financial interests</li> <li>Personal relationships</li> <li>Corporate opportunities"</li> </ul>	

Item	Recommendation	Good practices / Illustrating examples	Tools
	they should particularly pay attention)	First Compliance Pocket Guide, Conflict of Interest – p. 1]  Fédération Equestre Internationale (FEI) Internal Regulations of the FEI FEI Rules on Conflicts of Interest – p. 25  World Athletics Conflicts, Disclosures and Gifts Rules "Interest" means and includes for the purpose of the Integrity Code of Conduct and these Rules, any interest, direct or indirect, whether private or personal, financial or otherwise related to the individual concerned (including the interests of a third person closely related to the individual including a parent, spouse or other immediate family member or dependent), as may be further defined in guidance issued for purposes of implementing these Rules." World Athletics Rules on Conflicts, Disclosures and Gifts – Definitions  World Flying Disc Federation (WFDF) WFDF Rules and Policies (click on the link "WFDF Conflict of Interest Policy") WFDF Conflict of Interest Policy – Article II (2)  International Orienteering Federation (IOF) IOF Statutes, Codes and Policies (click on the link "Conflict of Interests Policy") IOF Conflict of Interests policy	

Item	Recommendation	Good practices / Illustrating examples	Tools
4.	The conflict-of-interest policy should clarify the difference between a conflict of interest and separate duties/loyalties in the event an individual sits in a representative	World Sailing Conflicts of Interest – World Sailing Policy World Sailing policy on Conflicts of Interest – Article 3  Fédération Internationale de Ski (FIS) FIS – Conflict of Interest Policy FIS Conflict of Interest Policy – Article 1.7	
	capacity.  (The distinction between conflicts of interest and other types of conflicts is vital for the determination of the measures that should be adopted in each of the different situations)	International Netball Federation (INF)  INF Codes INF Ethics and Anti-Corruption Code – Article 3.7 (b)  Example:  "A Director or Committee Member must not trade votes in exchange for benefits to their nominator (such as the promise of a future tour by one National Association in exchange for voting in that National Association's favour on another issue)"  [INF Ethics and Anti-Corruption Code – Note on Article 3.7 (b)]	
5.	When persons are in a situation of a conflict of interest, they should not participate in the decision-making process, nor exercise or appear to exercise any influence in the process.	Fédération Internationale de Football Association (FIFA)  FIFA Code of Ethics  FIFA Code of Ethics (version 2020) – Article 19.3  FIFA Governance Regulations (FGR)  FIFA Governance Regulations – Articles 10.4, 24.4 and 37.6 (e)  Example:	Tests for Identifying Conflicts of Interest <sup>7</sup>

\_

<sup>&</sup>lt;sup>7</sup> OECD (2005), Managing Conflict of Interest in the Public Sector: A Toolkit, OECD Publishing, Paris, <a href="https://doi.org/10.1787/9789264018242-en">https://doi.org/10.1787/9789264018242-en</a>.

Item	Recommendation	Good practices / Illustrating examples	Tools
	(This rule is the key element for the conflict of interest situations, as it indicates the major obligations of a person in this particular situation)	"A FIFA team member needs to withdraw himself from a supplier bidding procedure where one of the bidders is his brother-in-law."  [FIFA Compliance Pocket Guide, Conflict of Interest – p. 4]	
		International Olympic Committee (IOC)  IOC Code of Ethics  IOC Rules concerning Conflict of Interest affecting the behaviour of Olympic Parties – Article 4, p. 32	
		World Sailing Conflicts of Interest – World Sailing Policy World Sailing policy on Conflicts of Interest – Article 7	
		Fédération Internationale de Ski (FIS)  FIS – Conflict of Interest Policy  FIS Conflict of Interest Policy – Articles 1.17-1.20	
		Fédération Equestre Internationale (FEI) Internal Regulations of the FEI FEI Rules on Conflicts of Interest – p. 25	
		International Netball Federation (INF)  INF Codes INF Ethics and Anti-Corruption Code – Article 3.8 (a)	
		World Flying Disc Federation (WFDF)  WFDF Rules and Policies (click on the link "WFDF Conflict of Interest Policy")  WFDF Conflict of Interest Policy – Article III (2)	

Item	Recommendation	Good practices / Illustrating examples	Tools
		International Orienteering Federation (IOF)  IOF Statutes, Codes and Policies  (click on the link "Conflict of Interests Policy")  IOF Conflict of Interests policy	
6.	There should be a systematic and regular process for declaring interests, including on an ad-hoc basis whenever any change occurs to the	Union Cycliste Internationale (UCI)  UCI Management Committee (click on each name to see the register) UCI Declaration of interests (In particular, declaration of interests in terms of sport equipment)	
	nature and extent of those interests. A register should be kept and regularly updated by a designated person/body.	World Athletics Conflicts, Disclosures and Gifts Rules World Athletics Rules on Conflicts, Disclosures and Gifts – Articles 5 and 6	
	When possible, consideration should be made to making the declarations available to the public. Persons subject to declaration	World Sailing Conflicts of Interest – World Sailing Policy World Sailing policy on Conflicts of Interest – Article 6.3 World Sailing Declaration of Interests – p. 7-8	
	duties should be informed of their obligations and of the person/body to whom they should submit their declarations.  (The rule is important to ensure transparency and	Fédération Internationale de Football Association (FIFA)  FIFA Compliance Pocket Guide – Conflict of Interest  • Disclosure of conflicts renewed annually: when you join the team, you're asked to disclose any conflict of interest to FIFA HR and FIFA Compliance. This is renewed every year in the Compliance Portal (Convercent)  • Ad-hoc disclosure: if anything changes, you must tell your manager and submit an updated disclosure in the Compliance Portal (Convercent)	

Item	Recommendation	Good practices / Illustrating examples	Tools
	to keep all the persons concerned updated on the current interests of the sport organisation's members and on the risk	Procurement process: in addition to the above, each project lead must transparently declare any potential conflict of interest situation during the procurement process in SAP FIFA Compliance Pocket Guide, Conflict of Interest – p. 1	
	of a conflict of interest situation)	High Authority for transparency in public life (HATVP)  List of public officials who have to submit a declaration of interests  Presidents of sports governing bodies and bodies organising an international sports competition in France must submit an asset declaration and a declaration of interests to the High Authority for transparency in public life, which reviews each declaration. If substantial changes occur, a new declaration must be submitted.	
		Commonwealth Games Federation (CGF)  Constitutional documents of the CGF  CGF Register of Executive Board members' interest – Article 19 of CGF Constitution, p. 13	
		World Flying Disc Federation (WFDF)  WFDF Rules and Policies (click on the link "WFDF Conflict of Interest Policy")  WFDF Conflict of Interest Policy – Article VI  WFDF Director and Officer Annual Conflict of Interest Statement – p. 6	
7.	There should be a standard agenda item for assessing conflicts of	World Sailing Conflicts of Interest – World Sailing Policy World Sailing policy on Conflicts of Interest – Article 6.5	

Item	Recommendation	Good practices / Illustrating examples	Tools
	interest at meetings in the decision process.  (The maintenance of an agenda item for conflicts of interest is necessary to keep the participants in the meetings regularly updated on the situations that may arise in terms of conflicts of interests. It also provides board members with an opportunity to challenge others, if they believe there is an interest which has not been declared)	International Olympic Committee (IOC) For each IOC Executive Board meeting and Session, there is a conflict of interest check ahead of each discussion and vote.	
8.	There should be a person or body designated to provide advice, including confidential counselling, to persons confronted with conflicts of interest situations on what measures should be taken to mitigate them.  (This recommendation is prioritised because the existence of conflicts of	International Olympic Committee (IOC)  IOC Code of Ethics  IOC Rules concerning Conflict of Interest affecting the behaviour of Olympic Parties – Articles 4.3 and 5 (IOC Chief Ethics and Compliance Officer)  World Athletics  Conflicts, Disclosures and Gifts Rules  "Ethical Compliance Officer" means the person appointed by World Athletics to oversee the implementation of rules relating to ethical compliance, including developing and maintaining policies and procedures thereunder, and providing training, guidance and ad hoc advice	

Item	Recommendation	Good practices / Illustrating examples	Tools
	interest is a common situation and the concerned persons of a sport organisation should be able to receive advice by an appropriate person with specific knowledge on a case by case basis)	World Athletics Rules on Conflicts, Disclosures and Gifts – Definitions  Fédération Internationale de Football Association (FIFA)  FIFA Governance Regulations (FGR)  FIFA Governance Regulations – Article 17 (FIFA Chief Compliance Officer)	
9.	Information about the conflicts of interest rules should be published also in the major sport event's bid documentation.  (The publication of conflicts of interest rules in the major sport event bid documents is a necessity to raise awareness of the involved parties about the particular risks related to the process, to explain the obligations of a person in a conflict-of-interest situation and to set out the measures that should be taken if such a situation arises)	International Olympic Committee (IOC)  IOC Code of Ethics IOC Future Host Elections Rules of conduct for Targeted Dialogue – Article 1, p. 41  Fédération Internationale de Football Association (FIFA)  2026 FIFA World Cup Bidding Regulations FIFA Regulations for the selection of the venue for the final competition of the 2026 FIFA World Cup <sup>TM</sup> – Articles 3.6 and 4.2	

Item	Recommendation	Good practices / Illustrating examples	Tools
10.	Training and awareness raising programmes should be provided to individuals about conflicts of interest.	<ul> <li>International Olympic Committee (IOC)</li> <li>Mandatory e-learning for IOC Members and Staff at least every 2 years (in 2 languages)</li> <li>Onboarding information for new IOC Members and Staff by the Chief Ethics and Compliance Officer</li> </ul>	Case study examples <sup>8</sup>
	(The education of concerned persons of a sport organisation on the conflicts of interest rules is vital for ensuring a good culture in the sport organisation around this very common situation)	Fédération Internationale de Football Association (FIFA)  FIFA Governance Regulations (FGR)  Mandatory e-learning for FIFA Committee members completed at least every 2 years  FIFA Governance regulations – Article 22	
11.	Sanctions should be in place for failure to declare conflicts of interest, or for failure to follow corresponding rules/advice.  (The concerned persons should be aware of the consequences that they will encounter in the	Fédération Equestre Internationale (FEI) Internal Regulations of the FEI FEI Conflicts of interest – p. 26 ("Enforcement")	
		International Olympic Committee (IOC)  IOC Code of Ethics IOC Rules for the Register of Consultants – Article 4, p. 55	
		Fédération Internationale de Football Association (FIFA)  FIFA Code of Ethics  FIFA Code of Ethics (version 2020) – Article 19.4	

\_

<sup>&</sup>lt;sup>8</sup> OECD (2005), Managing Conflict of Interest in the Public Sector: A Toolkit, OECD Publishing, Paris, <a href="https://doi.org/10.1787/9789264018242-en">https://doi.org/10.1787/9789264018242-en</a>.

Item	Recommendation	Good practices / Illustrating examples	Tools
	event they violate the conflict of interests' rules)	World Athletics Integrity Code of Conduct World Athletics Integrity Code of Conduct – Article 6  Conflicts, Disclosures and Gift Rules World Athletics Rules on Conflicts, Disclosures and Gift – Article 6.5  Disciplinary Tribunal Rules World Athletics Rules of the Disciplinary Tribunal – Article 11  High Authority for transparency in public life (HATVP) List of public officials who have to submit a declaration of interests Failure to submit a declaration in the conditions established in articles 4 and 11 of law n°2013-907 is a criminal offense. It is punished by a 3-year imprisonment sentence and a 45 000€ fine.  World Flying Disc Federation (WFDF) WFDF Rules and Policies (click on the link "WFDF Conflict of Interest Policy") WFDF Conflict of Interest Policy – Article III (5)	