



GIBRALTAR FOOTBALL ASSOCIATION (THE "GFA")

CLUB LICENSING CONFIDENTIALITY & INDEPENDENCE PROCEDURE

The Club Licencing Unit of the GFA (the "CLU") is responsible for the Club Licencing system and Club Monitoring Process (the "Process") and ensures that the documentation submitted by Licence Applicants is handled with the highest standard of confidentiality, and assessed with unquestionable levels of independence. These are fundamental issues of the Process, and each individual involved in the CLU or the Process must declare those clubs in which they or a family member have an interest for example as member, shareholder, partner, sponsor, consultant.

Therefore, any full-time and part-time staff are bound by these principles as follows :-

GFA EMPLOYEES / MEMBERS OF THE CLU

Any employee of the GFA who is involved in any way with the Process, is bound by confidentiality clauses in his/her contract of employment. In addition to this, they are given this Procedure upon being assigned to the CLU or to assist with the Process in any way.

Furthermore, upon his/her appointment, a Declaration of Confidentiality & Independence as attached to this Procedure must be executed and dated. The Employee is fully briefed with the consequences of not adhering to these fundamental principles.

A GFA employee is bound by confidentiality & independence for the term stipulated in his/her contract of employment.

DECISION MAKING BODIES

Members of the First Instance Board and Appeals Board (as these terms are defined in the Gibraltar Club Licensing Regulations) must sign a Declaration of Confidentiality, Independence and Impartiality as attached to this Procedure upon their appointment, and this must be renewed every year. Prior to their appointment, the CLU explains to the Members the importance of confidentiality and independence in the Process, and is made aware of the consequences of not adhering to these principles. Each Member is given a copy of this Procedure to review. If a Member declares a conflict of interest he/she is removed from the respective Decision Making Body with immediate effect.

By following the above, confidentiality and independence is guaranteed to Clubs and Applicants. In addition to this, the CLU ensures confidentiality in the handling of applicant documentation as follows :

1. The Licensing Manager meets individually with each Applicant to discuss the documentation submitted in a private meeting room;
2. Applicant Files are kept and stored in accordance with the Filing & Archiving of Documents Procedure.

BREACH OF CONFIDENTIALITY & INDEPENDENCE

Any breach of confidentiality and/or independence is considered a serious offence and a breach of our Regulations.

As such, the individual(s) concerned will be charged with Misconduct in accordance with the GFA Statutes, and is liable to be disciplined accordingly.

To conclude, the CLU and GFA are aware that we are handling confidential and sensitive information. It is therefore imperative for us to respect the principles of strict confidentiality at all times. By doing so, we ensure that club licensing in our Association maintains its integrity and credibility and therefore the confidence of our clubs and all our other relevant parties.

Signed and approved this 1st day of February 2024

A handwritten signature in blue ink, appearing to be 'Ivan Robba', written in a cursive style.

Mr Ivan Robba
General Secretary