



***Conflict of
Interest Policy***
19 May 2025

CONFLICT OF INTEREST POLICY

1. Introduction

- 1.1 Paddle Scotland is the governing body of paddle sports within Scotland and its objectives are to advance, foster, encourage, represent and promote the interests of all paddle disciplines in Scotland.
- 1.2 Paddle Scotland strives to uphold the highest standards of governance within the organisation and across its respective obligations, enabling and ensuring transparency, diversity and inclusion, accountability and integrity.
- 1.3 This policy specifically relates to the arrangements in relation to Conflict of Interests for the organisation.

2 Purpose and Scope

- 2.1 The purpose of the Conflict of Interests Policy is to set out how Paddle Scotland will manage arrangements for the following roles:
 - Paddle Scotland Director or Paddle Scotland Committee Member;
 - Paddle Scotland Sub Committee or Working Group Member;
 - Paddle Scotland Employee;
 - A contractor or consultant working on behalf of Paddle Scotland;
 - Other Paddle Scotland appointment not covered by those listed above.

3 Conflicts of Interest

- 3.1 A conflict of interest exists when an individual's judgement and/or decision making is not exercised purely in the interests of Paddle Scotland because of the influence of their own personal interests and/or those of their family or any other person or body (e.g. their respective club).
- 3.2 All individuals must abstain from involving themselves in issues that directly and individually concern their own club or interest.
- 3.3 Individuals should seek to avoid placing themselves in any position which may lead to a conflict of interest. If such a conflict actually or potentially does occur it is the responsibility of the individual to inform the Chair of the Board, Chair of the Committee, Chief Executive Officer, line manager or other relevant individual(s), as appropriate.
- 3.4 Examples of conflicts of interest are:

- **External employment.** Board Directors do not require permission from Paddle Scotland before taking on any other paid employment, however all employment must be disclosed to ensure it does not interfere with their role as a Director or create some other conflict. Staff members employed on a full time or part time contract will need to inform their line manager, in line with contractual arrangements.
- **Acceptance of payment and gifts.** All Directors and staff members are required to declare to any payment, gift or other consideration received which is offered to them in that capacity. This is covered in more detail in Section 4.

3.5 The general principle is that all individuals highlighted in section 2.1 should disclose in the Register of Interests (the '**Register**') any interest, financial or otherwise, which is likely or would, if publicly known, be perceived as being likely to influence the exercise of their judgement.

3.6 The Register does not cover all interests, but specifically those relevant or potentially relevant to an individual's role. Individuals are in the best position to know whether any particular interest should be disclosed. Interests of close relatives may be declared if they are felt to be relevant.

3.7 If in doubt, on any issue, advice should be sought from the Chief Executive Officer.

3.8 All individuals are expected to complete and submit a Conflict-of-Interest declaration (Appendix 1) on their appointment and on an annual basis, as a minimum, as part of the good governance arrangements for the company. This will be provided in an accessible electronic format.

3.9 The Conflict-of-Interest declaration should also be updated by all individuals following any change to their personal or professional circumstances which require the completion of an updated declaration.

3.10 Conflict-of-Interest declarations will be added to the Register and reviewed by the Chair, Chief Executive or line manager (as appropriate) for any potential conflicts of interest. The Register will be available for review by all Directors.

3.11 Access to the Register will also be provided to relevant individuals and organisations including internal and external audit and **sportscotland**.

3.12 Each Board and Committee meeting will commence with a request that Directors and members declare any interest in the matters covered by the agenda. If during the meeting any other interest emerges then the Director/member concerned must declare that interest and may be asked to withdraw from the meeting whilst the matter concerned is discussed.

3.13 It is ultimately for individuals to assess whether or not any of their external activities could give rise to conflicts of interest and disclose these interests.

3.14 As such, any failure by an affected person to fulfil their obligations under this policy may be an event justifying removal from the Board of Directors or any Board Committee.

3.15 This covers both paid and voluntary employment and includes any agreement to provide personal services. Name of employer, post held, and the nature of the business should be stated.

3.16 Name of the bodies in which a position of authority (whether remunerated or voluntary) is held and the nature of the office held, including:

- trusteeships or participation in the management of charities and other voluntary bodies.
- public appointments, including for example appointments as a board member of another sporting body.
- elected offices.
- appointments within other organisations whose decision-making could affect Paddle Scotland's interests, and which could give rise to duality or a conflict of interest.
- paid and unpaid directorships and non-executive directorships in companies which are likely, or may be seeking, to do business with Paddle Scotland.

3.17 Details of any kinship relationship with any member(s) of staff of Paddle Scotland should be provided.

3.18 Details of membership of professional bodies should be provided.

3.19 Details should be provided of:

- companies in which the individual owns 5% or more of the issued shares or securities.
- businesses which the individual owns or partly owns, which are not companies,
- partnerships and consultancies in which the individual is a partner (or equivalent).

3.20 Details should be provided of any involvement in contracts which are not fully discharged, and which are:

- contracts for the supply of goods, services or works to Paddle Scotland or on its behalf; and/or between Paddle Scotland and either the individual or anybody or person which the individual is required to identify under this policy.
- Formal positions or connections with other sporting establishments

3.21 Details should be disclosed of any other material interest which reasonably could be regarded as potentially prejudicial to the open and impartial discharge of an individual's role.

3.22 Where a nil return is appropriate, then N/A should be entered against each section on the declaration form. The declaration should then be signed and dated by the individual making it.

4 Gifts and Hospitality

4.1 Paddle Scotland receives public funds to further its strategic objectives. As such, it is right and proper that gifts or hospitality provided to individuals is recognised and recorded appropriately to ensure good governance and to mitigate risk.

4.2 It is therefore essential that Individuals display the highest standards of personal honesty and integrity when dealing with gifts and hospitality and follow prescribed procedures to ensure transparency and propriety.

4.3 Paddle Scotland does not prohibit the receipt or giving of gifts or hospitality, however, when individuals receive or give gifts and hospitality, it may create the appearance of impropriety.

4.4 Paddle Scotland however recognises that there are often different circumstances surrounding the receipt and provision of gifts and hospitality and often each case has to be judged on its own merits.

4.5 The guiding principles governing the acceptance of gifts and hospitality by individuals:

- i. The conduct of individuals should not give rise to any suspicion of conflict between their official duty and their private interests.
- ii. Gifts and hospitality should never be solicited.
- iii. The actions of individuals should not give the impression to other stakeholders that they have been or may have been influenced by a gift.
- iv. Gifts and hospitality should never be accepted in exchange for doing, or promising to do or not to do, something.
- v. Gifts that are cash or cash equivalents, including gift certificates, should not be accepted.
- vi. Unduly lavish or extravagant, and not otherwise reasonable and customary, hospitality for the circumstances should be refused.
- vii. If any individuals are in doubt about the propriety of accepting a gift or an item of hospitality, then it should be refused.

4.6 In practice this means that neither you nor any member of your family should accept a gift or hospitality that would, or might appear to, place you under any obligation to the donor, compromise your impartiality or otherwise be considered improper.

4.7 These principles are of course to be applied with common sense. They are not intended, for example, to decline an isolated gift of trivial nature, or an inexpensive Christmas gift such as a diary or calendar.

4.8 Hospitality, such as the occasional working lunch during the course of an official visit, refreshments, invitations or tickets provided to events where others are

required to pay, individual restaurant meals and/or entertainment, formal occasions accompanied by hospitality e.g. facility openings, awards dinners etc may be accepted subject to the caveats in section 4.5, above.

- 4.9 Individuals should consult with the Chief Executive Officer or Chair if they feel there are circumstances surrounding a particular gift or hospitality which is not covered by the policy and which merit special consideration.
- 4.10 Paddle Scotland acknowledges that on certain occasions it is necessary to give gifts to other organisations or individuals as recognised etiquette or to colleagues as rewards under a recognition scheme. However, giving gifts should not be a regular occurrence and there should be a very good reason for doing so.
- 4.11 Gifts and hospitality should only be given to further the aims of Paddle Scotland and should represent value for money whilst also presenting Paddle Scotland in a favourable light. If you are aware that a person or organisation is considering entering into a business opportunity with, or otherwise do something which could have an effect on the business of Paddle Scotland in most circumstances, gifts and hospitality should not be offered to them, especially where they are the decision-maker.
- 4.12 Gifts must not be cash or cash equivalents, and gifts and hospitality must not be unduly lavish or extravagant. Hospitality must be given at venues, and be provided in a manner, which would not be harmful to Paddle Scotland's reputation.
- 4.13 The process involved in the decision to give gifts or hospitality should be fully transparent and the reason justifiable. Approval to incur gift and hospitality expenditure must be obtained from the Chief Executive Officer prior to incurring expenditure.
- 4.14 Paddle Scotland is required to keep a record of any and all gifts and hospitality received and given in the financial year. Details of gifts and hospitality received must be provided to Paddle Scotland via the Gifts and Hospitality Declaration (Appendix 2) and must be recorded annually in the Register of Gifts and Hospitality.
- 4.15 Sufficient detail must be included to ensure that the type of gift or hospitality can be identified. The onus is upon each individual to declare any gifts and hospitality at the earliest opportunity. It is not the responsibility of Paddle Scotland to seek this out.
- 4.16 Individuals are reminded that they must always be mindful that their decision to give or accept a gift or hospitality and the details pertaining to it may be disclosed to our membership. Directors should always consider their own reputation and that of the organisation, and they should sensibly record items on the register.
- 4.17 For the avoidance of doubt, gifts or hospitality given or received over the value of £50 must be provided via the Gifts and Hospitality Declaration for recording in the Register of Gifts and Hospitality.

5 Relationship to other Policies

5.1 This Policy forms part of the overall policy framework for Paddle Scotland but specifically relates to the following policies, plans and procedures:

- Anti-Bribery and Corruption Policy

6 Accountability/Reporting

6.1 Paddle Scotland is committed to principles of transparency and accessibility. To meet these objectives:

- a) This Policy will be made publicly available and listed on the Paddle Scotland website.
- b) A register of Conflicts of Interests will be maintained by Paddle Scotland.
- c) A register of Gifts and Hospitality will be maintained by Paddle Scotland.

7 Policy Review

7.1 This policy is subject to continuous review and will be reviewed on a three-year rolling basis, unless changes to legislation are enacted or governance arrangements require an earlier review.

8 Points of Contact

8.1 For further advice or guidance on this policy, the following can be contacted:

- Chief Executive Officer

Appendix 1 – Conflict of Interest Declaration

This form may be submitted electronically to all individuals to record Conflicts of Interest for the Register of Interests.

Paddle Scotland Conflict of Interest Declaration	
If providing a 'nil' response, please indicate this by marking 'N/A' against the relevant section.	
Name	
Date	
Post held with Paddle Scotland	
<p>Please provide details of appointments (whether remuneration or voluntary) and nature of office held, including:</p> <ul style="list-style-type: none"> ● trusteeships or participation in the management of charities and other voluntary bodies. ● public appointments, including for example appointments as a board member of another sporting body (e.g. sportscotland). ● elected offices (e.g. local councillor or within another paddle organisation or club). ● appointments within other organisations whose decision-making could affect Paddle Scotland's interests, and which could give rise to duality or a conflict of interest (e.g. grant funders). ● paid and unpaid directorships and non-executive directorships in companies which are likely, or may be seeking, to do business with Paddle Scotland (e.g. contractors or consultancies). 	
<p>Please provide details of any kinship relationship with any member(s) of staff or Board members of Paddle Scotland., or kinship relationships to anyone supplying services to Paddle Scotland.</p>	
<p>Please provide details of membership of professional bodies.</p>	
<p>Please provide details of:</p> <ul style="list-style-type: none"> ● companies in which the individual owns 5% or more of the issued shares or securities. ● businesses which the individual owns or partly owns, which are not companies (e.g. sole traders) ● partnerships and consultancies in which the individual is a partner (or equivalent). 	

<p>Please provide details of any involvement in contracts which are not fully discharged, and which are:</p> <ul style="list-style-type: none"> • contracts for the supply of goods, services or works to Paddle Scotland or on its behalf; and/or between Paddle Scotland and either the individual or anybody or person which the individual is required to identify under this policy. • Formal positions or connections with other sporting establishments. 	
<p>Please provide details of any other material interest which reasonably could be regarded as a potential conflict of interest with your role with Paddle Scotland.</p>	
<p>Signed</p>	

Appendix 2 – Gifts and Hospitality Declaration

This form may be submitted electronically to all individuals to record gifts and hospitality for the Register of Gifts and Hospitality.

Paddle Scotland Gifts and Hospitality Declaration	
<p>Please use this form to provide details of gifts and hospitality received or given over the value of £50.</p>	
<p>If providing a 'nil' response, please indicate this by marking 'N/A' against the relevant section.</p>	
<p>Name</p>	
<p>Date of gift or hospitality received.</p>	
<p>Date of gift or hospitality given</p>	
<p>Financial value of the gift or hospitality (noting that only gifts/hospitality over the value of £50 must be submitted)</p>	
<p>Name of the individual who the gift and/or hospitality was provided to or received from</p>	
<p>Please provide sufficient details on the nature of the gift or hospitality</p>	
<p>Signed</p>	