



Conflict of Interest Policy

Last Review:	21 October 2025
Next Review:	21 October 2028

This policy applies to directors and all staff, volunteers and contractors, and should be read in conjunction with the declaration of interest's form attached below. This form needs to be completed by all directors, committee members and senior staff and returned to the Paddle Cymru CEO.

Why we have a policy

We all have an obligation to act in the best interests of Paddle Cymru, and in accordance with Paddle Cymru's governing documents. Staff and volunteers have similar obligations.

Conflicts of interests may arise where an individual's personal, family or business interests and/or loyalties conflict with those of Paddle Cymru. Such conflicts may create problems because they can:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of Paddle Cymru; and
- Risk the impression that Paddle Cymru has acted improperly and inappropriately. This
 is detrimental to the company and the individual alike and must be avoided at all times.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

The declaration of interests

Accordingly, Paddle Cymru asks all directors, committee members and senior staff to declare their interests.

This declaration also covers any transactions that they receive in connection with their role with Paddle Cymru. (For example, a sponsorship arrangement, etc.)

A declaration of interest's form is provided for this purpose, listing the types of interest you should declare. The form is not exhaustive and if in doubt about any issues, guidance should be sought from both the CEO, or Chairperson. You should include all actual, potential and perceived conflicts of interest.

To be effective, the declaration of interests needs to be updated at least annually and also when any changes occur. This requires the individual to be honest and vigilant with this policy and keep the organisation updated on a regular basis and when changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the CEO, or Chairperson for confidential guidance.

Interests will be recorded on a register, which will be maintained by the CEO. The register will be accessible by the directors of the company and senior members of staff.

Data protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018 and the General Data Protection Regulation (as amended). Data will be processed only to ensure that Directors and all staff act in the best interests of the organisation. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest

In short, you should declare your interest at the earliest opportunity and withdraw from any subsequent discussion or involvement in the area of concern. The same applies if you face a conflict for any other reason. Most meetings will commence with a declaration of interest in relation to the agenda set. If appropriate, speak to the Chair of the meeting, or CEO in advance to avoid any difficult or conflicting situations.

You may, however, 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. (We are all members of the organisation, for example.)

If you fail to declare an interest that is known to the CEO, or the Chairperson, the Chairperson will declare that interest.

Decisions taken where a person has an interest

In the event of the Board (or a Board subcommittee) having to decide upon a question in which a director or member of staff has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and the decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested directors or committee members may not vote on matters affecting their own interests.

All decisions under a conflict of interest will be recorded by the CEO and reported in the minutes of the meeting. The report will record:

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

Where a person benefits from the decision, this may be reported in the annual report and accounts. Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.

Managing contracts

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 or audit of bills and invoices, and termination of the contract if the relationship is unsatisfactory.

Declaration of interests form

CATEGORY	DETAILS OF THE INTEREST AND WHETHER IT APPLIES TO YOU OR TO FAMILY
Current employment and any previous employment in which you continue to have a financial interest	
Appointments (voluntary or otherwise) e.g.: trusteeships, directorships, local authority, membership, tribunals, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations	
Investment in companies, partnerships and other forms of business or major shareholdings, where these are felt to constitute a potential conflict of interests	
Any contractual relationship with Paddle Cymru	
Ownership of any property that could create a conflict of interest	
Gifts or hospitality offered by external bodies and whether this was declined or accepted in the last twelve months (Note: These should be declared immediately in addition to the annual declaration.)	
Any other people, organisations, companies or institutions with whom you are connected whom you have not already referred to on this form	

To the best of my knowledge, the above information is complete and correct, and I will inform the board of any changes as soon as possible. I give my consent for this information to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Name	
Signature	
Date	