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**Conflict of Interest Policy**

**Version 1**

**Published: October 2022**

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**Sponsor: Treasurer**

**1. Introduction**

1.1. Everyone who represents North Highland Harriers (NHH) shall do so in the best interest of the club and act with integrity when making decisions on behalf of the club.

1.2. It is accepted that many members have interests outside of NHH, therefore it is the aim of this policy to identify any conflicts that could occur and ensure suitable management arrangements are in place to deal with them. This is important in order to maintain the reputation of the club and ensure members have confidence in the Committee.

1.3. This policy shall be reviewed at least every 3 years.

**2. Conflict of Interest**

2.1. A Conflict of Interest (COI) is a set of circumstances which create a risk that an individual’s ability to apply judgement or act in a role could be impaired or influenced by another interest.

2.2. Even a perception of competing interests, impaired judgement or undue influence may be damaging to the club’s reputation. Therefore any perceived or potential COI shall be managed in the same manner as an actual COI.

2.3. A COI may occur if an individual has a:

a. Direct or indirect financial interest.

b. Non-financial or personal interest.

c. Loyalty to another organisation/person.

2.4. The existence of a COI does not imply any wrongdoing.

2.5. If a COI is not correctly managed there is a risk that malpractice may occur, including but not limited to the following examples:

a. An individual, who is also a member of another club, may sabotage NHH’s performance in order to promote the other club.

b. An individual with the power to fundraise for NHH, who also has a financial interest in another business, may provide that business free or reduced price advertising.

c. An individual may abuse NHH funding to promote their own business interests.

d. An individual, who is also a member of another organisation, may copy NHH data to benefit the other organisation.

2.6. By identifying COIs and establishing appropriate management plans, the club is able to reduce the risk of malpractices occurring. This also maintains confidence in the integrity of the club.

**3. Declaration of Interests**

3.1. The first step in identifying COIs is to ask key people to declare their external interests.

3.2. Club Officers pose the most risk to the integrity of the club as they often have sole decision-making responsibilities, therefore all Club Officers shall declare their external interests.

3.3. External interests shall be declared if any of the following apply:

a. Do you, an immediate family member, or close associate own a business?

b. Do you have a significant stake (eg director, board member, major shareholder) in the company you are employed by?

c. Are you a member of another running club?

d. Are you a committee member, board member, or trustee of another organisation (including charities and community groups)?

e. Are you a member of any organisation that may conflict with the aims of NHH?

f. Do you have any other external interests that may cause a COI?

3.4. If any of the above external interests apply, the individual shall complete the Declaration of Interests Form at Appendix 1 and submit to the Treasurer. If the individual does not submit the Declaration of Interests Form, then it shall be interpreted that the individual has formally declared they do not have any external interests.

3.5. When making a declaration, individuals shall also consider whether anybody else would reasonably think that they have an interest significant enough to impair their own decision-making (a perceived COI).

3.6. As NHH is an amateur sports club, there is already an assumption that members are likely to be employed by another company, therefore this does not have to be declared unless there is a specific reason why it may cause a COI.

3.7. All Club Officers shall declare their external interests upon election and annually when re-elected. They shall also update their declarations whenever their external interests change.

3.8. Any member, regardless of their position, may be required to submit a Declaration of Interests Form if it is believed there may be a COI. This allows their interests to be properly assessed in relation to their position and if a COI is identified it may be appropriately managed.

**4. Assessment of Interests**

4.1. The Treasurer shall assess the individual’s external interests in relation to their specific role in the club and the duties they are likely to undertake. The existence of an external interest on its own does not automatically constitute a COI, it has to be judged along with their influences within in the club.

4.2. The individual shall provide as much detail in the Declaration of Interests Form as possible to allow an accurate assessment to be made. The individual may be required to provide further details if required. The result of the assessment shall identify if there are any COIs.

4.3. The Chairperson shall assess the Treasurer’s Declaration of Interests Form.

**5. COI Management Plan**

5.1. Where COIs have been identified in the assessment, a COI management plan shall be put in place. Where possible, the individual shall also contribute to the management plan in collaboration with the assessor, as it is much more harmonious if the plan is mutually agreed.

5.2. The aim of the COI management plan is to eliminate or reduce the risks associated with that COI. Each individual shall have their own management plan as they need to address a specific set of circumstances, which vary between people and roles.

5.3. Typical COI management plans may include, but not limited to, measures such as: preventing the individual from undertaking a specific decision-making duty, requiring somebody else to check their reasoning beforehand, or restricting their access to funding. There are numerous mitigation measures that may be put in place and they need to be appropriate for the specific COI.

5.4. The Treasurer shall approve and ensure compliance with the COI management plans. It is expected that most COIs may be effectively managed in this manner. If mitigation measures are put in place and a significant risk still exists, the Treasurer shall report their concerns to the Committee. The Committee shall discuss the management plan and develop further options. The process of escalating to the Committee in itself may be enough to reduce the risk as the more people who are aware of a COI and able to provide oversight, the less likely malpractice may occur unchecked. If a significant risk still exists, the Committee may ask the individual to relinquish their position or move to another more appropriate position.

**6. Responsibilities**

6.1. Club Officers shall make a full written declaration of interests using the Declaration of Interests Form, including any information that could result in a COI. This declaration shall be updated annually or when their circumstances change.

6.2. The Treasurer shall assess the Declaration of Interests Form to identify if there are any COIs and put in place a COI management plan.

6.3. All members shall attempt to avoid any COI occurring if possible. If a potential COI arises, members shall submit a Declaration of Interests Form to the Treasurer.

**7. Compliance**

7.1. Any member who does not abide by this policy or withholds information regarding a potential COI may be subject to disciplinary action.

7.2. Any individual who makes a false statement or withholds information or does not update their Declaration of Interests Form may be subject to disciplinary action.

7.3. Any individual who does not abide by their COI management plan may be subject to disciplinary action.

7.4. Compliance with this policy shall be monitored by the Treasurer.

**Appendix 1 – Declaration of Interests Form**

Name:

Position:

Date:

**Part 1 - Declaration of Interests**. To be completed by the individual. Please declare all external interests, giving as much detail as possible.

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| **External Interest** | **Declaration** |
| Do you, an immediate family member, or close associate own a business? |  |
| Do you have a significant stake (eg director, board member, major shareholder) in the company you are employed by? |  |
| Are you a member of another running club? |  |
| Are you a committee member, board member, or trustee of another organisation (including charities and community groups)? |  |
| Are you a member of any organisation that may conflict with the aims of NHH? |  |
| Do you have any other external interests that may cause a COI? |  |

**Part 2 – Assessment of Interests**. To be completed by the Treasurer.

Have any Conflicts of Interest been identified? Yes / No

**Part 3 – COI Management Plan**. List COIs and how they are to be managed.

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| --- | --- |
| **Conflict of Interest** | **Management Plan** |
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