



## **DAREBIN PICKLEBALL CLUB INC.**

### **CONFLICT OF INTEREST POLICY**

Version Date: June 2025

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#### **1. PURPOSE:**

The purpose of this policy is to ensure that all decisions made on behalf of Darebin Pickleball Club Inc (the “Club”) are made in the best interests of the Club and its membership, rather than in the personal interests of any individual. By identifying, disclosing, and managing real, potential, or perceived conflicts of interest, the Club protects its integrity, reputation, and the trust of its members.

#### **2. SCOPE:**

This policy applies to:

- All members of the Club’s committee.
- All volunteers or contractors who occupy decision-making roles (e.g., event organizers, coaches, treasurer).
- Any other person who is in a position to influence the Club’s operations, purchasing, hiring, or other decisions.

All Relevant Persons must read, understand, and comply with this policy.

#### **3. DEFINITIONS:**

‘**Conflict of interest**’ is defined as:

- a. Real, perceived or potential instances where a person, group or organisation could benefit from a decision or access to information. The benefit may be financial or non-financial.
- b. Where the immediate family or business connections of a committee member or any person with whom the Committee member is in a close relationship, stands to gain financially from any business dealings, programs or services of the club
- c. Where a Committee member has a role on another organisation/club, where the activities of that other organisation/club may be in direct conflict or competition with the activities of the Darebin Pickleball Club.

**‘Close relationship’** is defined as:

Any relationship that might reasonably give rise to an apprehension that the Committee member might place the interests of the other party above the interests of the club.

#### **4. IDENTIFYING CONFLICTS OF INTEREST:**

Relevant Persons should consider whether any of their personal interests or relationships might conflict with the Club’s interests in the following areas (this list is illustrative, not exhaustive):

- **Financial Interests**
  - Direct or indirect ownership or investment in any entity that conducts business with the Club (e.g., equipment suppliers, venue rental).
  - Receiving gifts, honoraria, or gratuities from anyone seeking a contract or favour from the Club.
  - Holding a position (paid or unpaid) with another charitable or sporting organization that competes for the same members, sponsors, or resources.
- **Family or Personal Relationships**
  - Close relationships (e.g., spouse, parent, sibling, child, or other immediate family) with someone seeking employment, contracting, or volunteer compensation from the Club.
  - Supervising or making decisions affecting a close friend or relative.
- **Outside Activities**
  - Serving on the board or in a decision-making capacity for any supplier, sponsor, or competitor.

- Engaging in outside employment or volunteer work that might clash with the impartiality required by the Club.
- **Gifts & Entertainment**
  - Accepting gifts—monetary or otherwise—that exceed a nominal value (e.g., meals, tickets, equipment) from anyone doing or seeking to do business with the Club.

## **5. DISCLOSURE PROCEDURES:**

### **1. Initial Disclosure**

- Upon election, appointment, or hiring, every Relevant Person must complete a **Conflict of Interest Disclosure Form** detailing any actual, potential, or perceived conflicts with the Club.
- The Disclosure Form must be submitted to the Club Secretary (or other designated officer) within 14 days of appointment.

### **2. Ongoing Disclosure**

- If a Relevant Person becomes aware of a new conflict (or a change in an existing conflict) during their tenure, they must update their Disclosure Form within 10 days.
- Annually, all committee members and officers must sign a statement reaffirming or updating their conflict disclosures.

### **3. Contents of Disclosure**

A Disclosure Form should include, for each potential conflict:

- Name of the Relevant Person.
- Nature of the relationship or interest (e.g., “My spouse owns Ace Sporting Goods, which may bid to supply paddles.”).
- Whether the conflict is Actual, Potential, or Perceived.
- Any action taken to manage or mitigate the conflict to date (if applicable).

### **4. Review of Disclosures**

- The Club Secretary (or an appointed Conflict Review Subcommittee) shall compile disclosures and present them to the Committee in confidence (omitting sensitive details where appropriate).
- The Committee shall determine whether a disclosed interest constitutes a conflict that requires management or, if minor, can be noted without further action.

## **6. MANAGEMENT OF CONFLICTS**

Once a conflict is identified and validated by the Committee, one or more of the following strategies should be implemented, depending on severity and context:

**1. Recusal from Discussion & Vote**

- The conflicted individual must not participate in any discussion, negotiation, or vote related to the matter in question.
- The Committee minutes should record that the individual recused themselves.

**2. Divestiture**

- If feasible and appropriate, the Relevant Person may divest the conflicting interest (e.g., selling a financial stake) to eliminate the conflict.

**3. Restrictions on Access**

- The individual may be denied access to certain confidential information (e.g., vendor bids, contract terms) related to the conflict.

**4. Third-Party Review or Arbitration**

- In complex or high-value transactions, the Committee may engage an independent third party (e.g., an outside auditor or legal counsel) to review bids or decisions.

**5. Resignation or Reassignment**

- Where the conflict cannot reasonably be managed, the Committee may request that the individual withdraw from participation in the specific matter or, in extreme cases, step down from their Club role.

**6. Documentation**

- All decisions regarding conflict management must be documented: what steps were taken, by whom, and when. This documentation shall become part of the Club's official records (see Section 7).

**7. CONFLICT OF INTEREST REGISTER**

**1. Purpose & Maintenance**

- The Club will maintain a **Conflict of Interest Register** (a separate, confidential record) in which all Conflict Disclosure Forms and management actions are recorded.

**2. Contents**

For each identified conflict, the Register should include:

- Name and role of the Relevant Person.

- Date of initial disclosure.
- Description of the conflict (actual, potential, or perceived).
- Actions taken to manage or resolve the conflict (e.g., recusal, divestiture).
- Date of committee approval of management plan.
- Date of resolution (if applicable).
- Signature of the individual making the disclosure (electronic or handwritten).

### **3. Access & Confidentiality**

- Only the Club Secretary, President, and designated members of the Committee shall have access to the Register.
- The Register is not open to general membership but may be reviewed by auditors or legal authorities if required by law.
- Records shall be retained for at least seven years after resolution or separation from the Club.

## **8. ANNUAL REVIEW & CERTIFICATION:**

### **1. Year-End Assessment**

- At the end of each fiscal year, the committee will undertake a high-level review of all existing Conflict Disclosures and management strategies to assess whether further action is needed (e.g. if a previously disclosed potential conflict has become actual).

## **9. BREACH OF POLICY & CONSEQUENCES:**

### **1. Failure to Disclose**

- If a Relevant Person fails to disclose a known conflict, the committee may:
  - Impose disciplinary measures (e.g. formal warning, suspension of privileges).
  - Require immediate correction (e.g. filing an updated Disclosure Form).
  - If the nondisclosure is wilful and material, remove the individual from office or terminate their role.

### **2. Improper Influence**

- Any attempt to influence Club decisions for personal gain—despite having disclosed a relevant interest—will be treated as a serious breach.

- The Committee may consider removal from any position, ineligibility for future roles, or other sanctions.

### **3. Appeal Process**

- A Relevant Person facing disciplinary action for a conflict misconduct may submit a written appeal to the committee within 14 days of notice.
- The committee (excluding any members directly involved in the alleged breach) will convene an ad hoc committee to review evidence and determine an appropriate outcome.