

Pride in Place Neighbourhood Board for Raffles and Morton

Conflict of Interest Policy

1. Purpose

The Pride in Place Neighbourhood Board for Raffles and Morton is responsible for making recommendations and decisions about significant public investment for the benefit of the local community. The Board must act fairly, transparently and in the interests of Raffles and Morton as a whole.

This policy sets out how Board members, sub-committee members, advisers, staff, volunteers and others involved in Board business must declare and manage conflicts of interest.

The purpose of this policy is to protect the integrity of the Board, maintain public trust, support good decision-making, and ensure that no person improperly influences decisions from which they, their organisation, family, friends or close associates may benefit.

2. Scope

This policy applies to:

- all voting members of the Neighbourhood Board;
- the Chair and any Deputy Chair;
- members of sub-committees, panels, working groups or advisory groups;
- any person involved in scoring, recommending, approving, commissioning, monitoring or reviewing projects;
- staff, contractors, consultants or volunteers acting on behalf of the Board where relevant.

This policy applies to all Board business, including project selection, funding recommendations, procurement, grants, recruitment, appointments, partnerships, delivery arrangements, monitoring, evaluation and communications.

3. Principles

Board members must act in accordance with the Seven Principles of Public Life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

Members must put the interests of the Raffles and Morton community ahead of personal, organisational, political or financial interests. Having an interest does not automatically prevent someone from serving on the Board. In a resident-led programme, many members will naturally have local connections. The important requirement is that interests are declared, recorded and properly managed.

4. What is a conflict of interest?

A conflict of interest arises where a person's ability to act solely in the interests of the Board and the community could be, or could reasonably be seen to be, affected by another interest.

Conflicts may be:

Actual: the conflict already exists.

Potential: the conflict may arise in future.

Perceived: a reasonable member of the public could think there is a conflict, even if the person believes they can act fairly.

Conflicts may also be:

Financial or pecuniary: involving money, property, employment, contracts, funding, paid work, business interests, gifts, sponsorship, or other financial benefit.

Non-financial or non-pecuniary: involving loyalty, influence, reputation, membership, friendship, family connection, political interest, organisational role, campaigning position, or other personal commitment.

5. Examples of interests that must be declared

Members must declare any interest that could relate to Board business, including:

- employment, consultancy, directorships, trusteeships or ownership of a business or organisation;
- membership of another board, charity, CIC, association, community group, political party or campaign group;
- involvement in an organisation that may apply for, receive, deliver or benefit from Pride in Place funding;
- land, property or business interests in or near the neighbourhood;
- close family, household, friendship or business relationships with someone who may benefit from a decision;
- gifts, hospitality, sponsorship or offers of benefit connected to Board work;
- any public position already taken on an issue where the Board is expected to make an impartial decision.

This list is not exhaustive. If in doubt, members should declare the interest.

6. Register of Interests

The Board shall maintain a Register of Interests.

Each member must complete a declaration of interests form:

- on appointment;
- annually;
- whenever their circumstances change;

- whenever a new interest becomes relevant to Board business.

The Register shall be held by the Secretariat or accountable body. The Board may publish a summary register where appropriate, subject to data protection, privacy and safeguarding considerations.

The Register should include the member's name, the nature of the interest, the organisation or person connected to the interest, whether it is financial or non-financial, and the date declared.

7. Declarations at meetings

"Declarations of Interest" shall be a standing item at the start of every Board, sub-committee and decision-making meeting.

Members must declare any relevant interest:

- before the meeting where possible;
- at the start of the meeting;
- immediately if an interest becomes apparent during discussion.

The minutes must record the interest declared and the action taken.

8. Managing conflicts

The Chair, supported by the Secretariat or accountable body where needed, shall decide how a declared interest should be managed. Where the Chair has the conflict, the Deputy Chair or another non-conflicted member shall decide.

Possible actions include:

- noting the interest only;
- allowing the member to remain and participate in discussion;
- allowing the member to provide factual information only;
- requiring the member to withdraw from discussion;
- requiring the member to leave the room or online meeting for that item;
- excluding the member from papers relating to that item;
- excluding the member from scoring, recommending, voting, monitoring or reviewing the matter;
- seeking advice from the accountable body or relevant governance officer.

The action must be proportionate to the seriousness of the conflict and the risk to public confidence.

9. Voting and decision-making

A member with a material conflict of interest must not vote on the relevant matter.

A member must not take part in scoring, ranking, recommending or approving any project, funding award, procurement, appointment or decision where they have a material conflict.

Where the conflict relates to an organisation applying for or receiving funding, a member who is an employee, trustee, director, committee member, contractor, close associate, or active representative of that organisation must not vote on that matter.

Where the conflict relates to a close family member, household member, business partner, employer, close friend or close associate, the member must not vote on that matter.

The conflicted member may only provide factual information if invited to do so by the Chair, and must then withdraw before debate and decision-making.

10. Quorum

A conflicted member who is required to withdraw from a decision shall not count towards quorum for that item.

If conflicts mean that a meeting is no longer quorate, the decision must be deferred unless an alternative lawful and properly governed decision-making process is available.

11. Chair conflicts

If the Chair has a conflict of interest on any matter, they must declare it and must not chair that item. The Deputy Chair, or another non-conflicted member chosen by the Board, shall chair that part of the meeting.

If the Chair has a significant or ongoing conflict that affects their ability to lead the Board impartially, the Board may seek advice from the accountable body, local authority, MP and/or MHCLG as appropriate.

12. Gifts and hospitality

Members must not accept gifts, hospitality, favours or benefits that could influence, or appear to influence, their judgement.

Any gift or hospitality connected to Board business must be declared to the Secretariat and recorded. Low-value refreshments at ordinary community or stakeholder meetings do not usually need to be recorded unless they could reasonably be seen as influencing a decision.

13. Procurement, grants and delivery partners

Conflicts must be managed especially carefully where the Board is considering:

- awarding funding;
- commissioning services;

- selecting delivery partners;
- approving projects proposed by Board members or their organisations;
- evaluating or monitoring projects;
- making recommendations to the accountable body.

A person connected to a potential supplier, applicant or delivery organisation must not be involved in designing the process in a way that could favour that organisation, assessing the proposal, approving the award, or monitoring performance, unless the Board has expressly agreed a limited and properly managed role.

14. Confidentiality and use of information

Members must not use confidential Board information for personal, organisational, political or commercial advantage.

Members must not share confidential information with any organisation or person who could gain an unfair advantage from it, including potential applicants, suppliers or delivery partners.

15. Failure to declare an interest

Failure to declare a relevant interest may be treated as a breach of the Code of Conduct.

Depending on seriousness, the Board may:

- require the member to update their declaration;
- record the breach in the minutes;
- exclude the member from a decision or role;
- review any decision affected by the undeclared conflict;
- refer the matter to the accountable body;
- recommend removal from the Board in serious or repeated cases.

A serious breach may include deliberately concealing an interest, influencing a decision while conflicted, or gaining personal or organisational advantage from Board information or funding.

16. Recording and publication

The minutes of each meeting must record:

- interests declared;
- whether the member remained, withdrew or left the meeting;
- whether the member voted;
- any action taken to manage the conflict.

In line with Pride in Place transparency expectations, conflicts reported at meetings should be included in published minutes unless there is a lawful reason not to publish specific personal information.

17. Review

This policy shall be reviewed at least annually, or sooner if required by changes to Pride in Place guidance, accountable body requirements, the Board's Terms of Reference, or relevant law.