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Pride in Place Neighbourhood Board – Conflict of Interest Policy

1. Purpose

1.1 This policy supplements the Neighbourhood Board Code of Conduct and provides further guidance on conflicts of interest. Its purpose is to:

- Protect the integrity and reputation of the Neighbourhood Board.
- Ensure decisions are made fairly, transparently and in the best interests of the community.
- Help Board Members identify, declare and manage actual, potential and perceived conflicts of interest.
- Comply with the requirements of the Board's Code of Conduct.

2. Scope

2.1 Applies to all Board Members, Chairs, guests and advisors involved in Neighbourhood Board business.

3. Principles

3.1 Members must act in the public interest, be transparent, and put community benefit ahead of personal interests. Further information is set out within the Neighbourhood Board Member Code of Conduct.

4. Definition of a Conflict of Interest

4.1 A conflict may be actual, potential or perceived where personal interests could influence decision making.

- Actual conflict: where a personal interest is directly influencing, or has the potential to influence, decision-making.
- Potential conflict: where a personal interest could influence decision-making in the future.
- Perceived conflict: where it could reasonably appear to others that a personal interest may influence decision-making, regardless of whether this is the case.

5. Registerable Interests

5.1 Employment, voluntary roles, trusteeships, directorships, financial interests, related party interests, political interests and other relevant interests must be declared.

6. Declaring Interests

6.1 Members must complete a due diligence form on appointment, update it within 28 days of any changes and declare relevant interests at meetings.

7. Managing Conflicts

7.1 Depending on risk, members may declare the interest only, participate in discussion but not vote, or withdraw from discussion and decision making.

7.2 Where a conflict exists, the Accountable Body will determine appropriate action. Actions may include:

- Low Risk: Interest declared and recorded.
- Medium Risk: Member participates in discussion but not decision-making.
- High Risk:
    - Member withdraws from discussion and voting.
    - Member is required to leave the meeting for the duration of the relevant agenda item.

7.3 The nature of the conflict and action taken must be recorded in the minutes.

8. Responsibilities

8.1 Members, Chairs and the Accountable Body share responsibility for compliance and record keeping.

8.2 Board Members are responsible for:

- Identifying conflicts.
- Declaring conflicts promptly.
- Maintaining accurate declarations and keeping their due diligence forms up to date.
- Complying with decisions about conflict management.

8.3 The Chair is responsible for:
- Ensuring declarations are requested at meetings.
- Managing conflicts fairly and consistently.
- Ensuring records are maintained.

8.4 The Accountable Body is responsible for:
- Maintaining the Register of Interests.
- Providing guidance where uncertainty exists.
- Assessing declared conflicts of interest and determining the appropriate action based on the level of risk (low, medium, or high), ensuring any measures taken are proportionate and recorded.
- Monitoring compliance.

9. Breaches

9.1 Failure to disclose a relevant interest may constitute a breach of the Code of Conduct.

9.2 Where a breach is identified, appropriate action will be considered, taking into account the nature and seriousness of the breach. Potential actions may include:
- Formal advice or a written warning.
- Additional training or guidance.
- Removal from a specific discussion, decision-making process, or project.
- Recommendation for removal from Board membership, where appropriate.

10. Review

10.1 This policy will be reviewed annually or sooner if governance arrangements change.

11. Effective Date

11.1 This Conflict of Interest Policy is effective as of 19/08/2026.