

Neighbourhood Committee Conflicts of Interest Policy

West Earlham & Bowthorpe

Pride in Place

Our neighbourhoods matter



1. Context

Our neighbourhoods matter.

This Board holds up to £20 million on behalf of the people of West Earlham and Bowthorpe. How we steward that money - and how transparently we do so - will determine whether people trust us, and whether that trust is deserved.

Conflicts of interest are not a shameful thing. They are inevitable in a community-rooted board where members are embedded in local life. What matters is how we handle them. Undisclosed conflicts of interest are the single greatest risk to the integrity of this programme. They undermine trust, compromise decisions and can unravel everything we are trying to build.

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2. Purpose

The Board exists to turn what local people say they want into reality - through a ten-year plan that is ambitious, accountable and genuinely resident-led.

It works toward three objectives set by the Pride in Place Programme:

- **Thriving places**
- **Stronger communities**
- **Stronger voices for local people**

This document sets out what a conflict of interest is, what Board members are required to declare, when and how to declare it, and what happens if things go wrong.

It should be read alongside the Terms of Reference and the Operating Principles and Guidelines.

3. Our principles

- All voices are welcome*
- We trust people to know what is best for them
- We believe people
- With responsibility comes accountability
- We listen
- We remove barriers - including unnecessary bureaucracy
- We make mistakes and learn
- We build on what is working and local assets
- We are inclusive and accessible
- We are democratic
- We are transparent
- We will consider the climate impact in all our decisions
- Decisions will be underpinned by long-term, democratic and preventative thinking
- We will connect and leverage other partnerships and communities
- We will seek to engage collaboratively across sectors to enable the levers of change
- We will embed buying local, social and sustainable
- *We will stand up to hate in all its forms — including hate speech, discrimination, or online abuse — directed at any person on the basis of their race, religion, disability, gender, sexual orientation, age, or any other characteristic

4. Why this matters

This Board makes decisions about public money on behalf of this neighbourhood. That is a serious responsibility - and it only works if people trust us to exercise it fairly.

That trust depends on every member being open about any interest they have in a decision before it is made. Not after. Not if someone asks. Before.

An undisclosed conflict of interest does not just affect one decision. It can call into question every decision the Board has made, damage the reputation of the programme and - most importantly - let down the people this programme exists to serve.

This is not about suspicion. Most conflicts are straightforward and easily managed once declared. The process exists to protect members as much as to protect the programme. Declaring an interest is the right thing to do, and it will never be held against you.

What we cannot accept is a conflict that is known and not declared. That is the line.

5. What counts as conflict of interest

- A conflict of interest arises when your personal, financial or organisational interests - or those of someone close to you - could influence, or appear to influence, a decision you are making on behalf of the Board.

This includes:

- **Financial interests** - where you, or someone close to you, stands to gain or lose money as a result of a Board decision. This includes employment, contracts, grants, investments or financial relationships with organisations seeking investment from the programme.
- **Personal interests** - where a close relationship with someone involved in a decision could affect your judgement, or reasonably appear to do so.
- **Organisational or project interests** - where you have a role (paid or voluntary) in an organisation that is seeking investment from, or has a significant relationship with, the programme.

Conflicts can be actual, perceived or potential. You do not need to be certain that a conflict exists to declare it. If it could reasonably look like one, declare it.

If you are unsure, speak to the Chair or Vice Chair in confidence before the relevant meeting. It is always better to declare and be told it isn't necessary than not to declare and wish you had.

5. What counts as conflict of interest contd

If a board member or a relative/close connection of that person, has an interest that is not one of the above types then it is unlikely to be a conflict of interest and is likely to be a **duality of interest**.

- **Duality of interest**

A **duality of interest** can exist where a board member, a member of their family or a friend may hold a position in another organisation, or sit on another board, or have undertaken paid work for an organisation but where there is no indication that these other interests would result in a benefit to them or that it would stop them from acting in the best interest of the West Earlham & Bowthorpe Pride in Place programme. It is unlikely that a duality of interest would be classified as a conflict of interest in this instance. In the interests of transparency, if ever in doubt, it is better to declare it and have the conversation.

6. What you must declare and when

You need to register your interests whenever your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable.

On appointment

- Before taking up their role, every Board member must complete a Declaration of Interest Form declaring all financial, personal and organisational interests - for themselves, their spouse, civil partner, life partner and close relatives - that could give rise to a conflict. The register will be maintained by the Secretariat and reviewed annually, or whenever circumstances change.

At every meeting

- At the start of each agenda item, members will be asked to declare any direct or indirect interest in the matter under discussion. Declarations will be recorded in the meeting notes.

When things change

- If a new interest arises between meetings - a new role, a new relationship, a new involvement with an organisation seeking investment from the programme - members must notify the Chair or Secretariat as soon as possible and update their Register of Interests.

When you're not sure

- If you are unsure whether something needs declaring, speak to the Chair or Vice Chair in confidence before the meeting. Declare it and let the Chair decide - that is always the right call.

7. What happens when you declare

Declaring an interest does not disqualify you from the Board. It protects you, your colleagues and the programme.

Declared interests will be recorded in the **Register of Interests held by the Secretariat.**

Once a conflict is declared, the following applies:

- You will be asked to leave the meeting for the duration of the relevant discussion
- You will take no part in the decision and will not vote
- Your departure and the reason for it will be recorded in the minutes
- You should not seek to influence the decision informally - before, during or after the meeting

The Chair will decide whether you need to leave the meeting. If the conflict involves the Chair, the Vice Chair or MP makes that call.

8. The investment exception

Board members are often embedded in local organisations - that is a strength, not a problem. Members must not be personally involved in investment applications made on behalf of an organisation they are connected to.

In exceptional cases where an application genuinely cannot be made by anyone else, the following must happen:

- The conflict must be declared in writing to the Chair in advance
- The Chair or Vice Chair will determine what mitigation is needed
- The member must absent themselves from all related discussions and decisions
- The member must not discuss the application with other Board members outside of the formal process

This exception is narrow. If there is any other way to manage the application without the Board member's direct involvement, that is what must happen.

9. Substitutes

Where a Board member sends a substitute to a meeting, that substitute carries exactly the same obligations under this policy as the member they are replacing.

They must complete a declaration of interests before attending and follow the same rules on leaving the meeting where a conflict exists.

10. Consequences of non-compliance

We take this seriously - not because we expect the worst of people, but because the community expects the best of us.

Where a member repeatedly or seriously fails to declare a conflict of interest as laid out in section 7, or participates in decisions they should have stepped back from, the Board will treat this as a breach of the Operating Principles and Terms of Reference.

In the most serious cases, where informal resolution with the Chair, MP and Accountable Body has failed, the Board may vote to remove you.

That is a last resort - but it is available, and the community's trust in this programme comes first.

Annex 1 - The Nolan Principles of Public Life

Selflessness: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.

Integrity: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it

Honesty: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership: Holders of public office should promote and support these principles by leadership and example.