

The Westway

Conflict of Interest Policy

This policy applies to trustees, all staff and volunteers and should be read in conjunction with the attached Declaration of Interests Form, which should be completed as stated below or otherwise as directed by the Board of The Westway.

This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem to the charity if they are openly and effectively managed. It is the policy of The Westway, as well as a responsibility of its trustees, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with their obligations to this charity.

What is a Conflict of Interest?

A conflict of interest is any situation in which a The Westway trustee's, staff's or volunteer's personal interests or loyalties could, or could be seen to, prevent The Westway Board or a staff member from deciding in the best interests of the charity. This personal interest may be direct or indirect and can include interests of a person connected to The Westway.

A person connected to The Westway includes: a parent, brother, sister, spouse, grandparent or grandchild of the individual, or a child of the spouse of the individual or any person with whom the individual is in a partnership or has a close friend relationship. It also includes any person the individual is employed by under a contract of service and can apply to a body corporate if the individual has control of it, or if the individual and any of the above-mentioned connected persons together have control over it.

Objective

This policy is to protect the integrity of The Westway's decision-making and management processes, to enable its stakeholders to have confidence in the charity's integrity and to protect the integrity and reputation of volunteers, staff and trustees.

All staff, volunteers and trustees of The Westway should seek to avoid any conflict of interest between the interests of the charity on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

Types of Interest which May Give Rise to Conflict

Financial Benefits or Interests

- Direct financial benefits or interests include, for example, employment of the trustees as employee, consultant or advisor, or the situation where a company of which the trustees is a director or shareholder, may be considered for a contract by The Westway. Other matters of financial interest include the sale of land or the use of a trustee's property by The Westway or granting of loans by the trustees to the charity.

Conflicts of interest in such cases are particularly serious and any financial benefit requires authorisation, usually by the Charity Commission.

- Indirect financial interests may arise where such potential financial benefits accrue to a close member of the trustees', staff or volunteers' family, friend, business partner(s) or colleague.

Further examples of conflicts of interest include:

- A trustee or staff member who is in a position to decide whether fees from a service provider should be increased;
- A trustee who is personally connected to a member of staff and there is decision to be taken on staff pay and/or conditions;
- A trustee who is in a position of authority of another organisation that is competing for the same funding;
- A trustee or staff member who has shares in or owns a business that may be awarded a contract to do work or provide services for The Westway.

Process

On appointment, The Westway's Manager and each trustee will be asked to make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated as appropriate. It will be the decision of the Manager to determine whether other staff or a volunteer should sign the Declaration of Interest form.

The Westway will manage conflicts of interest by requiring charity trustees, staff and volunteers to: avoid conflicts of interest where possible, identify and record any conflicts of interest, carefully manage any conflicts of interest, and follow this policy and respond to any breaches.

At the beginning of each Board meeting, trustees and any other person attending the meeting will be invited to disclose any potential conflicts of interest with any agenda item and to declare during the course of the meeting whether a discussion could lead to a conflict of interest arising.

Should a conflict of interest arise during the course of a Board meeting, the person conflicted may be asked to leave the room for the discussion and may not be able to take part in the decision depending on the judgement of the other trustees present at the time.

Any conflict of interest disclosure and the subsequent actions taken will be noted in the minutes.

This policy is not meant to supplement good judgment. Trustees, staff and volunteers should respect its spirit as well as its wording.

Data Protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that trustees, staff and volunteers act in the best interests of the charity. The information provided will not be used for any other purpose.

Signed: Chairman

Declaration of Interests Form

I _____ in my capacity as an employee/Volunteer/trustee of The Westway have set out below my interests in accordance with the organisation's Conflict of Interest Policy.

Category	<i>Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family or some other connected person</i>
Any employment in which you continue to have a financial interest	
Appointments (voluntary or otherwise) e.g. trustee, director, councillor, tribunal panel member, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings and beneficial interests	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months	
Any contractual relationship with the charity or its subsidiary	

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed: _____

Position: _____

Date: _____

Dated: 16 06 20