



the
westway
a community hub for all

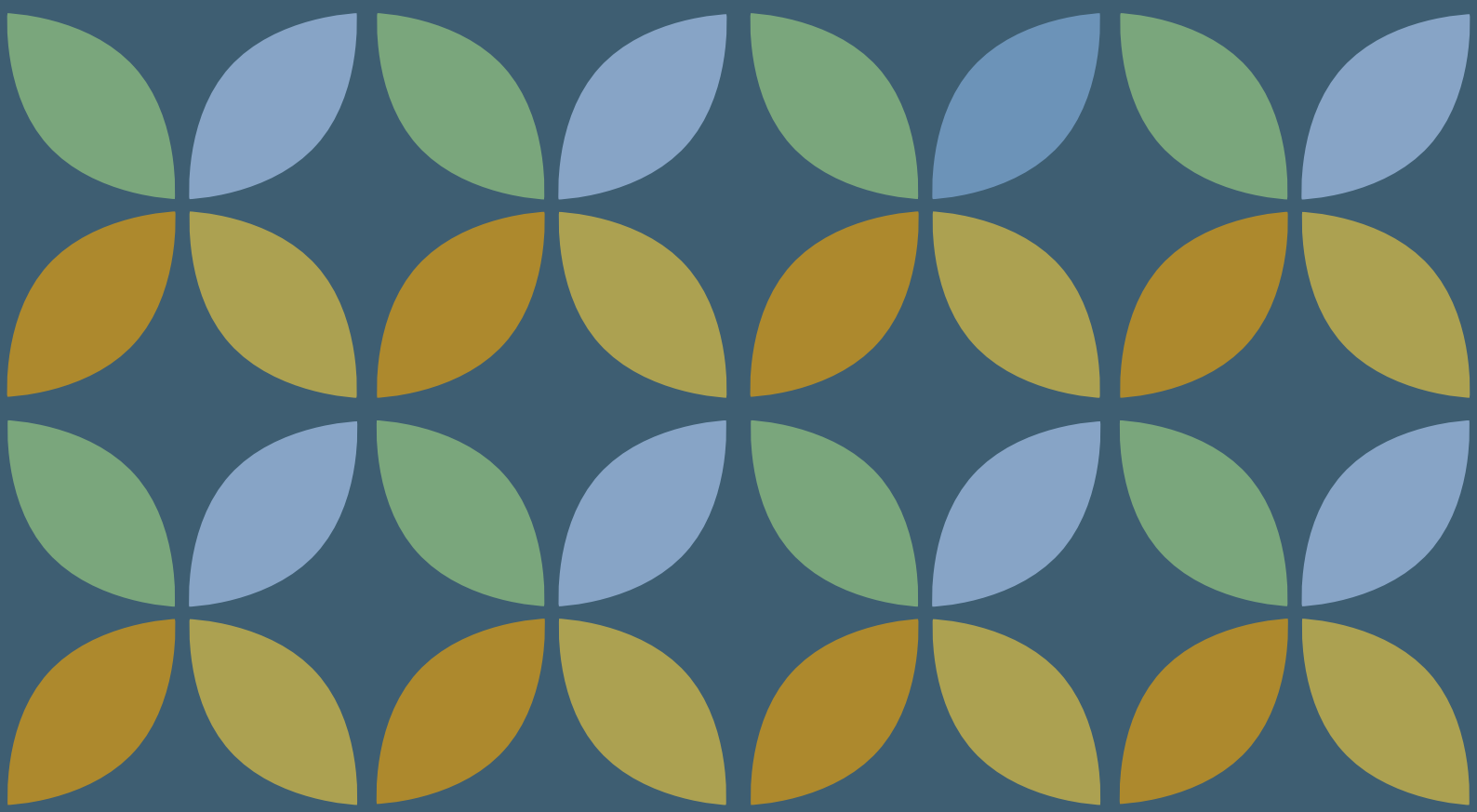
Conflict of Interest Policy

Leads: Mary Marsden, Caroline Liggins

Effective Date: 25.07.2025

Review Date: 25.07.2026

Reviewed 6/08/2026



1. Purpose

This policy applies to all trustees, staff, and volunteers of The Westway. It should be read alongside the attached Declaration of Interests Form, which must be completed as directed by the Board.

Conflicts of interest are common and do not necessarily pose a problem if they are openly disclosed and properly managed. The Westway's policy, and the responsibility of its trustee, is to avoid ethical, legal, financial, or other conflicts of interest wherever possible.

Where conflicts do arise, they must not interfere with individuals' duties and obligations to the charity.

2. Scope

A conflict of interest happens when a trustee, staff member, or volunteer's personal interests or loyalties might, *or could appear to*, stop them from making decisions that are in the best interests of The Westway.

These personal interests can be direct or indirect and may also include the interests of people connected to them. People connected to an individual include:

- Parents, siblings, spouse, grandparents, grandchildren
- Children of their spouse
- Partners or close friends
- Anyone they employ under a contract of service

This also applies to any company or organisation that the individual controls, or controls together with any of the connected persons listed above.

3. Scope

This policy applies to all trustees, staff, volunteers, contractors, and anyone involved in decision making or representing The Westway.

4. Objective

This policy is designed to safeguard the integrity of The Westway's decision making and management processes, ensuring that all stakeholders can trust the charity's honesty and fairness. It also protects the reputation of our volunteers, staff, and trustees.

Everyone involved with The Westway, whether staff, volunteers, or trustees, should actively avoid conflicts between the charity's interests and their own personal, professional, or business interests. This includes both real conflicts and situations that might appear to be conflicts.

5. Financial: Types of Interests That May Cause a Conflict

Financial Benefits or Interests:

- Direct financial interests include situations such as:
- A trustee being employed by The Westway as an employee, consultant or advisor.
- A trustee being a director or shareholder in a company that The Westway may contract with.
- The sale or use of a trustee's property by The Westway.
- Trustees providing loans to the charity.
- Conflicts involving financial benefits are particularly serious and usually require authorisation from the Charity Commission.

Indirect financial interests arise when potential financial benefits apply to close family members, friends, business partners, or colleagues of trustees, staff, or volunteers.

Other Examples of Financial Conflicts Include:

- A trustee or staff member who can decide whether fees paid to a service provider should be increased.
- A trustee who is closely connected to a staff member involved in decisions about pay or conditions.
- A trustee who holds a leadership role in another organisation competing for the same funding.
- A trustee or staff member who owns shares in, or controls, a business that might receive contracts from The Westway.

6. General: Types of Interests That May Cause a Conflict

- **Personal Relationships:** When a trustee, staff member, or volunteer has a close personal relationship (family, friend, partner) with someone involved in decision making, recruitment, or contract awarding, which could influence impartiality.
- **Professional or Business Interests:** Holding roles or having connections in other organisations that might compete, collaborate, or have contracts with The Westway, creating divided loyalties.
- **Gifts and Hospitality:** Accepting gifts, hospitality, or favours from individuals or organisations that may seek to influence decisions or gain favourable treatment.
- **Employment or Potential Employment:** When an individual (or their connected person) is considered for employment, promotion, or contracts by The Westway, which could affect fairness in the recruitment or contracting process.
- **Confidential Information:** Misuse or disclosure of sensitive or confidential information obtained through involvement with The Westway for personal or external benefit.
- **Dual Roles or Positions:** Holding a position in another organisation that conflicts with The Westway's objectives, interests, or funding priorities.
- **Political Activities or Affiliations:** When a trustee, staff member, or volunteer's personal political beliefs, affiliations, or activities might conflict with The Westway's impartiality, values, or public perception, or influence decision making inappropriately.

7. Declaration

- All relevant interests must be disclosed promptly to the Chair of Trustees or designated person.
- Disclosures should be made when joining The Westway and updated regularly or as soon as a new conflict arises.
- Trustees must declare any conflicts at the start of each meeting.

All declarations should be declared verbally and followed up with a disclosure of conflict interest form. Below shows who to declare to.

- **Volunteers:** Managerial Staff
- **Managerial Staff:** Trustees
- **Trustees:** In trustees meeting

8. Managing Conflicts of Interest

Once a conflict is disclosed, it will be managed by one or more of the following steps:

- The individual may be asked to withdraw from discussions or decisions related to the conflict.
- The individual may be excluded from voting on the matter.
- The organisation may take steps to remove or reduce the conflict, where possible.
- In some cases, resignation or reassignment may be necessary.

9. Record Keeping

- All declarations of interest and actions taken to manage conflicts must be recorded in a Conflict of Interest Register and in meeting minutes where relevant.
- The register will be reviewed regularly by the Trustees.

10. Breaches of this Policy

Failure to disclose a conflict of interest or to comply with this policy may lead to disciplinary action, up to and including removal from office or termination of involvement with The Westway.

11. Data Protection

The information collected will be handled in line with the data protection principles outlined in the Data Protection Act 2018. It will be used solely to ensure that trustees, staff, and volunteers act in the best interests of the charity and will not be used for any other purpose.

12. Who to Contact

Comments, Concerns or Complaints can be raised to:

Centre Manager: mary.marsden@thewestway.org

Charity Manager:

Chair of Trustees: caroline.liggins@thewestway.org

13. Policy Sign Off

This policy was written by Abi Chapman, Charity Manager on the 20.07.2025

This policy was approved by

This policy will undergo a full review by the 20.07.2026

Declarations of Interest Form

I _____ in my capacity as an employee/volunteer/trustee of The Westway have set out below my interests in accordance with the organisations Conflict of Interest Policy

Category	Please give details of interest and whether it applies to yourself, or where appropriate, a member of your immediate family or some other connected person.
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	
Investment in unlisted companies, partnerships and other forms of business, major shareholding 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 _____