

LONGHOPE PARISH COUNCIL

Conflicts of Interest Policy (adopted October 2026)

This policy applies to all councillors, employees and volunteers working for the Council

Why we have a policy

Councillors have a legal obligation to act in the best interests of the Council and in accordance with the Council's Financial Regulations, and to avoid situations where there may be a potential conflict of interest.

Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of the Council. Such conflicts may create problems that:

- inhibit free discussion;
- result in decisions or actions that are not in the interests of the Council or the public; or
- risk the impression that the Council has acted improperly.

The aim of this policy is to protect both the Council and the individuals involved from any appearance of impropriety.

What is a conflict of interest?

There are two types of conflict of interest:

- a financial conflict of interest ('financial conflict'), and
- a conflict of loyalty ('loyalty conflict')

In this guidance, a 'conflict of interest,' means both financial and loyalty conflicts.

Financial conflicts

These happen when a councillor, or a person or organisation connected to them (a connected person) ¹could get money – or something else of value such as a service – from a decision that the Council makes. The councillor will have a conflict between the Council's best interests and their own interest in either standing to receive the benefit or being connected to a person or organisation that will.

¹ Localism Act 2011 Section 30 defines who is a 'connected person'. It includes certain people or organisations closely connected to a Councillor such as:

- a child, parent, grandchild, grandparent, brother or sister of a trustee
- a spouse or civil partner of a trustee or of a relative listed above
- a business partner of a trustee or of a relative listed above
- organisations in which the trustee or any of the above have a controlling or substantial interest

It doesn't matter if the value of the benefit is small: it is still a financial conflict. It is also still a conflict if the Council will get a good deal. For example, if one of the Councillors is providing a service to the Council at a reduced cost.

Financial conflicts can happen in a range of situations. For example, where the councillor (or connected person) is receiving money or something else of value because of:

- providing the Council with goods or services
- selling or leasing land or other assets (such as equipment) to the Council)
- buying or renting land or other assets from the Council

It also involves situations where the councillor will get better access to a service that the Council provides. For example, if a councillor can use a council asset at a reduced rate.

Loyalty conflicts

These can happen when the Council's decision involves a connected person. For conflicts of loyalty this may also include:

- a councillor's employer
- a councillor's wider relatives
- a councillor's friends

Such a decision may involve a loyalty conflict because the councillor's loyalty or responsibility to the other person or employer could influence their decision making. This means they might not be able to make a decision based only on what is in the best interests of the Council.

The declaration of interests

Councillors must declare their interests, and any gifts or hospitality offered and received in connection with their role in the council. A declaration of interests' form is provided for this purpose, listing the types of interest that should be declared.

The declaration of interests will be updated at least annually, and when any material changes occur.

This register of interests shall be used to record all gifts and hospitality received by the councillors, employees and volunteers, and will be maintained by the Council's Clerk.

Data protection

The information provided will be processed in accordance with the Data Protection Act 2018. Data will be processed only to ensure that councillors, staff and volunteers act in the best interests of the Council. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest

If a councillor, employee or volunteer believe they have a real or perceived conflict of interest they should:

- declare the interest at the earliest opportunity
- withdraw from discussions and decisions relating to the conflict.

The Parish Clerk will take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the Council generally without disclosing such sensitive information that could place the individual in an untenable position.

An interest must be declared at the earliest opportunity, and the councillor, employee or volunteer must withdraw from any subsequent discussion unless expressly invited to remain to provide information. In this case the person with the conflict may not participate in, or influence, the decision or any vote on the matter. The councillor will not be counted in the quorum for that part of the meeting and must withdraw from the meeting during any vote on the conflicted item.

There are situations where a councillor may participate in discussions from which they could indirectly benefit, for example where the benefits are universal to all users. This action will be agreed by the Chair and minuted accordingly.

If you fail to declare an interest that is known to the Council Clerk and/or Chair, they will declare that interest on your behalf.

Decisions taken where a councillor or member of staff has an interest

In the event of the Council having to decide upon a question in which a councillor or member of staff has an interest, all decisions will be made by vote, with a simple majority. A quorum must be attained for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

All decisions under a conflict of interest will be recorded by the Clerk and reported in the minutes of the meeting. The report will record:

- the nature and extent of the conflict;
- an outline of the discussion; and
- the actions taken to manage the conflict.

Where a councillor or employee is connected to a party involved in the supply of a service or product to the Council, this information will be fully disclosed at the annual meeting of the Council.

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.

Managing contracts

If a councillor, employee or volunteer has a conflict of interest, they must not be involved in managing or monitoring a contract in which they have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory

Declaration Form and Register of Interests

I as employee/trustee/volunteer * [*delete as appropriate] of the Longhope Parish Council have set out below my interests in accordance with the Council's conflicts of interest policy.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, tribunals 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 these were declined or accepted in the last 12 months.	
Do you use, or care for a user of the organisation's services?	
Any contractual relationship with the council	
Any other conflicts that are not covered by the above	

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.

I understand that the information provided will be held in accordance with the Longhope Parish Council Data Protection Policy.

Signed:

Position:

Date: