

Reviewed: June 2025

## INTRODUCTION

The Lowestoft Place Board seeks to maintain the highest standards of integrity in delivering its role. This document sets out the policy adopted for managing conflicts of interest that may arise in respect of Lowestoft Place Board members and officers.

As board members who are responsible for making decisions on projects or initiatives that use public funds, members and officers are expected to act in accordance with The Nolan principles. These principles underpin the conduct expected of Place Board members and officers, including that they should seek to avoid perceived, potential or actual conflicts of interest arising in relation to their role.

This policy sets out our approach to managing such conflict of interests therefore ensuring the Place Board's reputation and integrity is not compromised; and should be read in conjunction with the Lowestoft Place Board's Code of Conduct.

## CONFLICTS OF INTEREST SCOPE

A conflict of interest is considered to be any interest, connection, association, or other set of circumstances that: (a) is (or might appear to be) likely to impair or influence a board member's judgment in engaging in Lowestoft Place Board business; or (b) might impede a board member's ability to carry out their Lowestoft Place Board role; or (c) might result (or could result) in a board member's (or a member of their family) or a related third party receiving a personal benefit or being perceived to be using their position within the Lowestoft Place Board to gain an unfair advantage.

Conflicts of interest may arise because of many different circumstances, including but not limited to:

- direct or indirect financial interests.
- non-financial or personal interests.
- acceptance of gifts or hospitality; or
- conflicts of loyalty where a decision maker may have competing loyalties between a person or an organisation to which they owe a primary duty, and another person or organisation. For example, conflicts of interest can include enhancement of an individual's financial or other opportunities, career, education, or professional reputation, or access to privileged information, facilities, or other benefits.

The Place Board acknowledges that conflicts of interest are sometimes unavoidable but need not necessarily exclude a board member from participating in a discussion. Board members are appointed for the skills and experience that they bring to the Board; and it is important to strike a balance between avoiding conflicts of interest while still allowing them to contribute to areas where their experience is valuable and appropriate.

Judgment is, therefore, required in considering whether board members should recuse themselves, or be excluded, from a particular piece of Lowestoft Place Board business. We operate a policy of transparency, to which the principles of openness and integrity apply. Board members are required to disclose any perceived, potential, or actual conflicts of interest when they arise or, if identified after such conflict of interest has arisen, promptly after they become aware of a conflict of interest.

If a conflict (potential, perceived or actual) could be significant enough that an individual's role on the Lowestoft Place Board becomes untenable and that they should resign from the Lowestoft Place Board.

## IDENTIFYING CONFLICTS OF INTERESTS

On appointment, board members are required to declare any interests they have which do, or might, give rise to a conflict of interest in relation to any area of the Lowestoft Place Board's work.

East Suffolk Council, as responsible body, maintains a register of interests (ROI) setting out the interests declared by each board member and will update the ROI immediately on notification of any changes. Any updated ROI is published on the Lowestoft Place Board website within a fortnight after each review is concluded. The register of interests is public information and can be accessed here: [www.eastsuffolk.gov.uk/business/regeneration-projects/lowestoft-towns-deal-and-levelling-up/](http://www.eastsuffolk.gov.uk/business/regeneration-projects/lowestoft-towns-deal-and-levelling-up/)

It is the responsibility of board members to report, in writing, to the Lowestoft Place Board Chair, or East Suffolk Council, any changes to their interests promptly after the change occurs or after the board member becomes aware of a perceived, potential, or actual conflict of interest (for example, a new interest arises, the circumstances relating to a previously declared interest change or a previously declared interest ceases to exist).

## MANAGING CONFLICTS OF INTERESTS IN FORMAL MEETINGS

Should a perceived, potential, or actual conflict of interest be identified during a formal meeting in relation to a matter to be considered in that meeting, the relevant board member shall not participate in any decision regarding that matter. The Chair (or, if the Chair is conflicted, the Deputy Chair) and the appropriate representative for East Suffolk Council, will determine whether the board member should participate in the related discussion.

The board member may be asked to recuse themselves for the part of the formal meeting where the board members discuss, or decides on, that matter. However, with the consent of the individual concerned, if the Chair to the Lowestoft Place Board concludes that the board member's expertise will be beneficial to the discussion, and that the conflict of interest will not:

- result in a benefit or advantage to the board member (or a family member or a third party with which they have a relationship); and
- be to the detriment of the Lowestoft Place Board, they may permit the board member to participate in the discussions. The Chair's decision in the matter is final.
- The minutes of the meeting will state if any board members were recused themselves from any discussions.

## MANAGING CONFLICTS OF INTERESTS OUTSIDE MEETINGS

When an opinion or other document is circulated for full comment, any conflicted board member will advise East Suffolk Council whether they need to recuse themselves from comment.

## RESPONSIBLE PERSON AND ANNUAL REVIEW OF POLICY

The responsible body in relation to this policy is East Suffolk Council, who shall ensure that the policy is reviewed and updated as appropriate no less frequently than annually.

The Place Board shall review the policy (updated as appropriate) and approve any revision of it at a Place Board meeting.

## RECORD KEEPING AND GOVERNANCE

East Suffolk Council will maintain a record of all conflicts of interest identified, which shall include the name of the relevant board member, the nature of the conflict, measures taken to manage it and the names of the persons involved in any decisions taken in respect thereof. This can be viewed here:

[www.eastsuffolk.gov.uk/business/regeneration-projects/lowestoft-towns-deal-and-levelling-up/](http://www.eastsuffolk.gov.uk/business/regeneration-projects/lowestoft-towns-deal-and-levelling-up/)

## PREVENTION, DETECTION, AND RESPONSE TO BREACH OF CONFLICTS OF INTEREST

It is the responsibility of each board member to report to the Chair of the Place Board or East Suffolk Council, any conflicts of interest of their own or where they become aware that another board member has a perceived, potential, or actual conflict of interest. East Suffolk Council will also be expected to monitor continuously any potential conflicts as part of their day-to-day management of Place Board activities.

If any third party brings a perceived, potential, or actual conflict of interest to the attention of the Place Board, it shall be reported to the Chair and/or East Suffolk Council, and dealt with in the same manner as other conflicts of interest under this policy.

If a board member fails to disclose a conflict of interest or fails to act in accordance with the Chair's advice (or the advice of East Suffolk Council where the Chair is conflicted) on how to manage a conflict, disciplinary action, or dismissal could occur. In such an event, the Place Board may, where appropriate, reconsider any decisions taken, and/or withdraw any opinion or other statement issued by the Place Board, in relation to any recommendations made.

## OVERSIGHT ARRANGEMENT

The Chair of the Place Board and East Suffolk Council will be responsible for ensuring that the Place Board's conflict management policy and systems are functioning effectively and may ask for a review of the arrangements to be undertaken periodically to provide assurance of that.

## DECLARATION

These Conflicts of Interest policy shall be reviewed annually by the members.

By signing the below, I confirm that I have read and agree to this policy.

**Name of Board Member accepting the Conflicts of Interest policy and approval on behalf of their organisation:**

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**Name of Organisation Board Member represents:**

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**Date:**

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