

West Somerset Railway Association

Conflict of Interest Policy Guidance

1. Trustees/Directors (Trustees) have a legal obligation to act in the best interests of the West Somerset Railway Association (the Association) and in accordance with the Association's governing document and avoid situations where there may be a potential conflict of interest.
2. Conflicts of interests may arise where an individual's personal, family or business interests and/or loyalties conflict with those of the Association.
3. Such conflicts may create problems; they can:
 - a. discourage free discussion;
 - b. result in decisions or actions that are not in the interests of the Association; and
 - c. risk the impression that the Association has acted improperly.
4. The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.
5. The Association has adopted a Conflict of Interest Policy based on the Charity Commission's model.
6. Trustees are asked to declare their financial interests and relationships, and those of their family and business connections. A declaration of interests form is provided for this purpose (Annex A). Trustees should declare all interests. It is for the Board to determine whether these are material to the business of the Association.
7. The declaration of interests needs to be updated at least annually and also when any changes occur.
8. At the beginning of all meetings a Trustee should declare if there is an item on the agenda where there may be a conflict of interest. If a Trustee realises within the meeting that he or she has a conflict of interest with an item being discussed, then the Trustee must immediately inform the meeting.
9. The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2003. Data will be processed only to ensure that Trustees act in the best interests of the Association. The information provided will not be used for any other purpose.
10. Annual declarations of interest should be reviewed by the chair who should consider if any conflicts need to be considered by the Board to determine whether these are material to the business of the

Association. Declarations made at meetings should immediately be considered by the Board.

11. If the Board considers that there is a material conflict of interest, the Trustee will be asked to leave the room when that item is discussed.
12. The Board may resolve on a particular process (e.g. in regard to the award of a contract or the making of an appointment) so that a conflict can be satisfactorily managed.
13. In regard to a particular item on the agenda the Board may determine:
 - a. There is not a significant conflict of interest;
 - b. The conflict can be managed if the Trustee remains in the meeting but not does participate in the discussion unless the chair requires a specific point to be clarified; or
 - c. The Trustee should withdraw from the room whilst the item is being discussed.
14. All decisions made where there was a conflict of interest should be recorded and reported in the minutes of the meeting. The report should record:
 - a. the nature and extent of the conflict;
 - b. an outline of the discussion;
 - c. the actions taken to manage the conflict.

Paul Whitehouse
Company Secretary

West Somerset Railway Association Declaration of Interest Form

I {insert name of Trustee} have set out below my interest and those of connected persons in accordance with the Association's Conflict of Interest Policy.

<i>Category</i>	<i>Please give details of the interest and whether it applies to you or where appropriate a connected person.</i>
Current employment and any previous employment in which the Trustee continues to have a financial interest	
Appointments (voluntary or otherwise) e.g.: Directorships, trusteeships, local authority, membership, tribunals etc	
Membership of any professional bodies, special interest groups or mutual support organisations	
Investment in companies, partnerships and other forms of business major shareholdings, beneficial interest where these are felt to constitute a potential conflict of interests.	
Any contractual relationship with the West Somerset Railway Association	
Ownership of any property that could create a conflict of interest	
Gifts or hospitality offered by external bodies and whether this was declined or accepted in the last twelve months	
Any other conflicts that are not covered above where there could be perceived to be conflicts of interest	
Any other people, organizations, companies or institutions with whom you are connected whom you have not already referred to on this form	

To the best of my knowledge, the above information is complete & correct. I undertake to update 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: _____

Date: _____