

Upper Medway Internal Drainage Board

Conflict of Interest Policy

The Upper Medway Internal Drainage Board (UMIDB) is committed to maintaining the highest standards of integrity, accountability, and transparency in all aspects of its work. All decisions made by the Board, its members, staff, and contractors must be in the best interests of the organisation and the communities it serves.

To safeguard public confidence and uphold ethical governance, UMIDB requires the declaration and effective management of any actual, perceived, or potential conflicts of interest.

Purpose and Scope

The purpose of this policy is to:

- Ensure that personal or financial interests do not improperly influence—or appear to influence—the decision-making processes of UMIDB.
- Support Board members and employees in identifying, disclosing, and appropriately managing conflicts of interest.
- Uphold public trust and comply with the legal and regulatory standards applicable to public bodies.

This policy applies to:

- All Board members (elected or appointed), employees, contractors, consultants, and volunteers acting on behalf of UMIDB.

Definitions

A conflict of interest arises when an individual's personal, professional, or financial interests—whether direct or indirect—may compromise, or be seen to compromise, their duty to act in the best interests of UMIDB.

Conflicts may be:

- Actual: A real conflict currently exists.
- Perceived: A reasonable person could perceive a conflict, even if none exists.
- Potential: A conflict may arise in the future due to known circumstances.

Examples include:

- Financial interests in companies that may benefit from UMIDB contracts.
- Family relationships with contractors or stakeholders.
- Holding a secondary employment or appointment that overlaps with Board activities.

Policy Commitments

UMIDB will:

- Require all members, staff, and relevant contractors to declare conflicts of interest on appointment and regularly thereafter.
- Maintain a central Register of Interests, which is reviewed and updated annually.

- Require declarations to be made at the start of all meetings, projects, or decision-making processes where a conflict may arise.
- Ensure that any declared conflicts are managed in accordance with agreed procedures—this may include withdrawal from decision-making, reassignment of duties, or independent oversight.
- Treat undeclared or mismanaged conflicts seriously, and investigate in line with disciplinary procedures or the Code of Conduct where appropriate.

Governance and Accountability

The Clerk is responsible for overseeing the implementation and enforcement of this policy. The Board Chair (or Vice Chair, where applicable) will provide independent oversight of conflict declarations made by Board members.

Failure to declare or appropriately manage a conflict may constitute a breach of public duty and result in disciplinary action or referral to external standards bodies.

Monitoring and Review

UMIDB will review this policy annually and update it as required to reflect changes in legislation, governance practices, or organisational structure.

Regular audits or self-assessments will be conducted to ensure compliance and continuous improvement in the management of conflicts of interest.

Delivery Procedures

Declarations of Interest

All Board members and relevant staff must complete a Declaration of Interests form on appointment and review it annually. Any changes must be reported within 28 days. New submissions will be required every 5 years regardless.

All members must make declarations of interest at any meeting where an agenda item pertains to them or where there is or potentially is, a conflict of interests

Register of Members Interests

The Clerk will maintain a Register of Interests, updated/reviewed annually or upon receipt of new declarations. This will be available to members of the public using a Freedom of Information request.

Meeting Conduct

At the beginning of each meeting, members will be asked to declare any relevant interests. Where a conflict exists, the member must withdraw from the discussion and decision-making.

Non-Compliance

Failure to declare a conflict may result in investigation and, if substantiated, disciplinary action or removal from post.

June 2026 Amendment

- Added reference to separation of general register of members interest and meeting item interests.