Conflict of Interest Policy

Policy Created: April 2023

Last Reviewed: March 2026

Next Review: March 2027 (or sooner if significant changes in legislation, guidance, or organisational activities occur)

Reviewed by: Laurence Clark

Responsible Officer: CEO

Approved by: CEO

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1. Introduction and Commitment

Pathways Associates CIC is a disabled-led Community Interest Company dedicated to enabling people with learning disabilities, autistic people, and their families to live the lives they choose as equals in their local communities. The organisation is committed to the highest standards of governance, transparency, and ethical decision-making, which includes effectively identifying, disclosing, and managing conflicts of interest. Conflicts of interest can arise when personal, professional, or financial interests interfere with objective judgement, potentially harming our mission or reputation. This policy ensures such conflicts are handled openly to maintain trust, accountability, and focus on community benefit.

As of March 2026, this policy aligns with current best practice, including guidance from the CIC Regulator (updated February 2026 on governance for small CICs), the Charity Commission's conflicts of interest framework (adapted for CICs), ICAEW recommendations on ethical management, and the Companies Act 2006 requirements for director duties. It emphasises proactive disclosure, proportionate management, and regular reviews to prevent undue influence. This policy supports our Corporate Responsibility Policy (ethical standards), Counter Fraud and Security Management Policy (preventing misuse), Safeguarding Adults and Children Policy (protecting interests in decisions), Equality and Diversity Policy (fair processes), and Information Governance and Data Protection Policy (secure handling of declarations).

It reflects our values of being led by lived experience (Experts by Experience contributing to policy reviews), partnership (collaborating on disclosures), inclusion and respect (non-judgemental processes), innovation (digital declaration tools), and integrity (transparent handling). We commit to a culture where conflicts are disclosed without fear, managed ethically, and used as opportunities for learning.

2. Scope

This policy applies to all situations where a conflict of interest may arise, including financial (e.g., contracts with relatives), personal (e.g., family ties), or professional (e.g., competing roles). It covers Board members, employees, associates, volunteers, Experts by Experience, contractors, and anyone in decision-making positions. It includes actual, potential, or

perceived conflicts. The policy does not cover day-to-day operational decisions without significant impact (refer to line managers).

3. Key Objectives

The organisation aims to identify and disclose conflicts early to prevent bias or harm. It seeks to manage conflicts proportionately, ensuring decisions prioritise community interest. Compliance with legal duties (e.g., director declarations under Companies Act) is ensured, with protections against detriment for disclosers. An ethical culture is fostered through awareness and accountability. Learning from disclosures improves governance.

4. Core Principles

Conflicts are inevitable but must be managed transparently to avoid impropriety. Disclosure is mandatory and proactive. Management is proportionate, from recusal to withdrawal. No-blame approach encourages reporting. Confidentiality protects personal information (links to Data Protection Policy). Inclusivity ensures accessible declaration processes. Accountability requires records and reviews.

5. Roles and Responsibilities

The Board oversees policy and reviews annual declarations/themes. The CEO holds accountability for implementation and appoints a Conflicts Lead (integrated with governance role). The Conflicts Lead advises on disclosures, maintains the register, and coordinates management. Line managers support staff disclosures and flag concerns. All covered individuals disclose conflicts promptly and update annually. Experts by Experience contribute to reviews. External auditors review compliance annually.

6. Procedures

6.1 Types of Conflict of Interest Conflicts include:

- Financial: Personal gain from contracts, suppliers, or grants
- Personal: Family/friend involvement in decisions
- Professional: Competing roles or loyalties
- Perceived: Situations appearing biased, even if not

Examples: Board member related to a supplier; employee with external consultancy overlapping our work.

6.2 Disclosure Procedure Disclose in writing to Conflicts Lead/CEO as soon as aware (using declaration form). Annual declarations for all in scope. Register maintained securely, reviewed quarterly by Board. Updates required on changes.

6.3 Decisions and Management Assess impact (low/medium/high risk). Management options:

- Recusal from discussions/decisions
- Restrictions on access to information
- Reassignment of duties
- Withdrawal from role if unmanageable Decisions documented; appeals to Board.

6.4 Managing Contracts and Procurement Declare interests before bidding. Recuse from evaluations if conflicted. Use competitive processes; document rationale.

6.5 Donations and Gifts Declare gifts over £50. Refuse if conflicting. Donations scrutinised for influence.

6.6 Breaches Non-disclosure investigated per Disciplinary Policy. Serious breaches may lead to termination.

7. Training, Awareness, and Support

Annual governance training includes conflicts (accessible). Induction briefs new joiners. Awareness via resources and meetings. Support for disclosers includes confidential advice.

8. Monitoring, Review, and Continuous Improvement

Policy reviewed annually or on changes. Monitoring via register, audits, feedback. Learning co-produced with Experts by Experience. Feedback welcomed; annual summaries in CIC report.

9. Conclusion

Pathways Associates CIC is dedicated to managing conflicts ethically to protect our integrity and mission. By disclosing transparently and managing proportionately, we uphold our disabled-led values and ensure decisions benefit our communities.