

Birchen Coppice Neighbourhood Board

Code of Conduct and Declaration of Interests Policy

June 2026

How to use this document: This policy explains the standards expected of Board members, when and how interests must be declared, and the procedures for managing confidentiality, decision-making, gifts, communications, attendance, breaches and supporting appendices.

1. Introduction

1.1 This Code of Conduct and Declaration of Interests Policy sets out the standards expected of members of the Birchen Coppice Neighbourhood Board when carrying out Board business. It also explains how members should work with Wyre Forest District Council, as the accountable body, and with the Ministry of Housing, Communities and Local Government in delivering the 10-year vision and investment plan.

2. Purpose and Policy Statement

2.1 The Board recognises that actual, potential or perceived conflicts of interest may arise during its business.

2.2 The Board will support members to carry out Plan for Neighbourhoods business effectively while reducing the risk of poor outcomes or criticism linked to conflicts of interest.

2.3 The Board expects the highest standards of conduct, integrity, accountability, transparency, openness and probity in all areas of its work.

2.4 The Board will act impartially and in the public interest at all times.

2.5 The Board will follow this Code and any relevant local or national plan for Neighbourhoods guidance when managing actual, potential or perceived conflicts of interest. Clear processes must be in place for managing conflicts, including commercial interests, in decision-making.

2.6 This Code ensures that conflicts of interest are identified, recorded and managed. This protects the integrity of the Board, supports public confidence in its decisions, and helps protect the reputation of the Board and its members.

2.7 Wyre Forest District Council, as the accountable body, provides guidance in this document on the pecuniary and non-pecuniary interests that must be declared and the process Board members must follow.

3. Scope and Applicability

3.1 This Code applies to all Board members, working groups and co-opted members.

3.2 Members must confirm, when accepting or continuing in office, that they will follow this Code.

3.3 This Code also applies to Council staff involved in delivery and to advisers, whether or not they are voting representatives.

3.4 Members must comply with this Code when carrying out Board business, representing the Board, or otherwise acting as Board members.

4. Decision Making and Board Responsibilities

4.1 Board members must:

- Make decisions based on evidence and the objectives of the Board.
- Consider advice provided by the accountable body and professional officers.
- Ensure public funds are used appropriately, economically and effectively.
- Avoid predetermination and bias.

4.2 Once decisions have been properly made, members are expected to support them collectively, regardless of personal views expressed during discussions.

5. Role of the Accountable Body

5.1 Wyre Forest District Council acts as the accountable body. Board members must:

- Respect its statutory, financial and governance responsibilities.
- Co-operate with reasonable requests for information and assurance.
- Observe policies and procedures that the accountable body requires the Board to follow.
- Recognise that final accountability for public funds rests with the accountable body where applicable

6. Standards of Conduct

6.1 Board members must act in line with the Seven Principles of Public Life, also known as the Nolan Principles, which are set out in Appendix 1.

6.2 Board members must:

- Treat all individuals with dignity, courtesy and respect.
- Promote equality, diversity and inclusion.
- Not discriminate, harass, bully or victimise others.
- Work collaboratively and constructively with fellow members, officers and stakeholders.
- Comply with all relevant laws, regulations and policies.
- Respect the role of the accountable body and its statutory responsibilities.
- Act in a manner that protects and enhances the reputation of the Board and the accountable body.

6.3 Board members must not:

- Use their position improperly for personal gain.
- Bring the Board into disrepute.
- Make misleading or inaccurate statements.
- Abuse, intimidate or harass any individual.
- Misuse Board resources or confidential information.

7. Conflicts and Declarations of Interest

7.1 Board members must:

- Actively identify any actual, potential or perceived conflicts of interest.
- Complete a declaration of interest form (Appendix Three) and pass to the Council to maintain a Register of Interests.
- Declare relevant interests at the earliest opportunity and at the start of meetings where applicable.
- Withdraw from discussions and decisions where a conflict exists or where asked to do so by the Chair or Council Officer (acting in accordance with their accountable body role).

7.2 Examples of interests include:

- Financial interests.
- Employment or business relationships.
- Membership of organisations seeking funding or support from the Board.
- Family or close personal relationships with applicants, suppliers or stakeholders.

8. Confidentiality and Information Governance

8.1 Board members must:

- Respect the confidentiality of information received in their role.
- Comply with data protection legislation and information governance requirements.
- Use information only for legitimate Board purposes.
- Ensure confidential papers are stored and handled securely.

8.2 Confidential information must not be disclosed unless:

- Proper authority has been given;
- Disclosure is required by law; or
- The information is already lawfully in the public domain.

8.3 These confidentiality obligations continue after a member leaves the Board.

9. Political Neutrality

9.1 Board members must:

- Respect differing political views.
- Not use Board meetings or activities for party-political purposes.
- Ensure decisions are made in the interests of the Board's objectives and the community served.

9.2 This Code does not prevent individuals from being politically active in a personal capacity, provided this does not conflict with their Board duties.

10. Gifts, Hospitality and Benefits

10.1 Board members must:

- Not seek or accept gifts, hospitality or benefits that could reasonably be perceived as influencing decision-making.
- Declare any offers of gifts or hospitality in accordance with Board procedures.
- Refuse inappropriate offers.

10.2 Modest hospitality linked to legitimate Board business may be accepted where it does not create, or appear to create, a conflict of interest. Modest hospitality, provided that it is normal and reasonable in the circumstances, e.g. lunches during a Board related visit, may be acceptable. It should not exceed the scale of hospitality which the Board would be likely to offer. With low value gifts and small gratuities, Board Members should, if possible, refuse it. If it is not possible to refuse the gift, e.g. where such an item is left for the Board Member without being offered or posted, it should be returned to the person who sent it and the Chair notified if possible. The Council will keep a record of hospitality and gifts received, or refused, other than the low value gifts and small gratuities mentioned above.

10.3 In certain instances, hospitality is not acceptable e.g. in connection with regulatory action.

10.4 If in doubt the Board Member should seek advice from the Chair and Council.

11. Communications, Media and Political Neutrality

11.1 Board members must:

- Ensure public statements accurately reflect agreed Board positions.
- Not claim to speak on behalf of the Board unless authorised.
- Use social media responsibly.
- Avoid comments that could damage public confidence in the Board or the accountable body.

11.2 When expressing personal opinions, members should make clear that they are speaking in a personal capacity.

12. Attendance, Participation and Training

12.1 Board members are expected to:

- Attend meetings regularly.

- Read papers in advance.
- Participate constructively in discussions.
- Notify the Chair of any inability to attend meetings.
- Undertake relevant training and development where required.

12.2 Persistent non-attendance may lead to a review of Board membership. 13. Equality, Diversity and Inclusion

13.1 The Board is committed to creating an environment that is:

- Inclusive and welcoming.
- Free from discrimination, harassment and bullying.
- Respectful of different backgrounds, experiences and perspectives.

All members are expected to uphold and promote these commitments.

14. Breaches and Failure to Comply

14.1 Concerns about a possible breach of this Code may be raised with:

- The Chair of the Board;
- The Vice-Chair (where the complaint concerns the Chair); or
- The designated officer of the accountable body.

14.2 Complaints will be considered fairly, proportionately and promptly. Possible outcomes include:

- Informal resolution.
- Written advice or warning.
- Requirement to undertake training.
- Removal from specific responsibilities.
- Recommendation to terminate Board membership in accordance with the Board's terms of reference.

Appendix 1 – Seven Principles of Public Life

1 Selflessness

Holders of public office should act solely in terms of the public interest.

2 Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

3 Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

4 Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

5 Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

6 Honesty

Holders of public office should be truthful.

7 Leadership

Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

Appendix 2 – Examples of Conflicts and Mitigation

Examples of potential conflicts of interest and proposed mitigation

Example 1	A Board member takes part in commissioning or purchasing a service for the Board, and the member, their spouse, business associate or close personal friend has a financial interest in one of the organisations being considered for funding. Mitigation 1: The Board member does not attend meetings where the purchase is discussed and does not take part in authorising the purchase.
Example 2	A Board member takes part in commissioning or purchasing a service for the Board, and the member, their spouse, business associate or close personal friend has a non-financial interest in one of the organisations being considered for funding, for example as an unpaid board member of that organisation. Mitigation 2: The Board member is excluded from the process. If the conflict becomes known during the process, the process is restarted without that member's involvement.
Example 3	A Board member communicates with a stakeholder in circumstances where either the Board's view or the view of another organisation connected to the member could be expressed, and those views may differ. Mitigation 3: The Board member makes clear who they are representing in all communications. For example, they should use the correct letterhead or email signature and make clear in the message which organisation's interests are being represented.
Example 4	A Board member influences a policy or strategy in a way that could give an organisation connected to them an unfair advantage over others. Mitigation 4: The Board member does not have sole responsibility for approving the policy or strategy.

Appendix 3 – Commitment Form

I confirm that I have read and understood this Code of Conduct and agree to follow it. I acknowledge that failure to meet these standards may result in termination of Board membership.

Name: Adele Bratt	
Signature 	Date 24/7/26

Appendix Four - Declaration of Interests Form (for Public Register of Interests)

Important: Members of the Board Please;

1. Read the notes before completing each section of the form
2. Remember that the interests to be notified include those of your spouse/partner as detailed on page 1 of the notes (these will not be shown separately on the website that displays the public register)
3. Write Clearly
4. Do NOT include any abbreviations or acronyms
5. Ensure that you enter "None" in any of the boxes under headings where there is nothing to be registered
6. Ensure that you sign and date the notification
7. Remember to keep your register of interests up to date, as this is a legal duty. Inform the MO when your interests change and complete a new form if required to do so.
8. A form must be completed within 28 days. It is a criminal offence to fail to register interests in accordance with the Localism Act 2011
9. Complete this document with reference and in conjunction with the Code of Conduct and Declarations of Interests Policy

Register of Interests

I, Adele Bratt, (role) of the Pride in Place Board, give notice that I have set out below the Disclosable Pecuniary Interests which are required to be notified to the Monitoring Officer further to the provisions of the Localism Act 2011 and The Relevant Authorities (Disclosable Pecuniary Interests) Regulations, and other registerable interests as required by my code of conduct.

Consent for storing submitted data:

- ☒ Yes, I give permission to store and process my data.
☐ No, I do not consent to storing and processing my data.

N/A	N/A
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7. Securities

Board member	Spouse, civil partner or equivalent
N/A	N/A

8. Gifts or Hospitality worth an estimated value of £50 or more

Board member	Spouse, civil partner or equivalent
N/A	Not applicable

Part B

9. Other Registerable Interests-please see the note for explanation

Board member	Spouse, civil partner or equivalent
steering group member (volunteer) for Silverwood residents	Not applicable

Your declaration

I wish to declare the following interests that conflict or may be perceived to conflict with my duties as a Member of the Board and agree not to take part in any Board decisions or recommendations affected by this interest. If you have no such interests, please state "nil."

Signed (Board)		Date	24/7/26
Monitoring Officer		Date	

Amendment received:	Date:
The amendment was received by the Monitoring Officer	Date
Signed	Date

Notes and Guidance

Whose interests must be included?

PART A

1. Employment, office, trade, profession or vocation

Board member	Spouse, civil partner or equivalent
Adele Bratt	Robert Bratt

2. Sponsorship

Board member	Spouse, civil partner or equivalent
N/A	Not applicable

3. Contracts

Board member	Spouse, civil partner or equivalent
Stroke Association	Contracts Manager - JN Bentley

4. Land and Property

Board member	Spouse, civil partner or equivalent
Home	Home

5. Licences

Board member	Spouse, civil partner or equivalent
N/A	N/A

6. Corporate tenancies

Board member	Spouse, civil partner or equivalent
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The Act provides that the interests which must be notified are those of a member or co-opted member of the authority, or

- those of a spouse or civil partner of the member or co-opted member
- those of a person with whom the member or co-opted member is living as husband/wife
- those of a person with whom the member or co-opted member is living as if they were civil partners
- in each case where the member or co-opted member is aware that the other person has the interest.

Part A – Disclosable Pecuniary Interests

Section 1: Employment etc.

You must include details of, “any employment, office, trade, profession or vocation carried on for profit or gain”. Please ensure that:

- you include a short description of the activity concerned: for example, "Computer Operator" or "Accountant"
- you give the name of any employer, e.g. the company which pays your salary or wages
- where an office is held, the name of the person or body who made the appointment is given

Please note that:

- the Monitoring Officer does not consider that receiving a basic or special responsibility allowance further to Pride in Place duties to be a disclosable pecuniary interest
- there is no need to enter (as examples) “retired” or “retired doctor” – if there is nothing which applies to you or your spouse/partner under this section, please simply enter “None”.

Section 2: Sponsorship

You must include details of, “any payment or provision of any other financial benefit (other than from the Pride in Place of which you are a member or co-opted member) made or provided within the relevant period in respect of any expenses incurred by you in carrying out your duties as a member. (The “relevant period” being the period of twelve months ending with the day when you make a notification). This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.”

Please note:

- the time period mentioned in the section “When should the monitoring officer be notified of disclosable pecuniary interests”

Section 3: Contracts

You must include details of, “any contract between you, or your spouse, civil partner or equivalent, or a body in which either of you have a beneficial interest, and the Pride in Place of which you are a member or co-opted member:

- under which goods or services are to be provided or works are to be executed;
and
- which has not been fully discharged”

- A body in which you or your spouse, civil partner or equivalent have a beneficial interest means a firm in which you/they are a partner, or a body corporate of which you/they are a director, or in the securities of which you/they have a beneficial interest).
- Director” includes a member of the committee of management of an industrial and provident society.

Section 4: Land and Property

You must include details of,

“any land which is within the area of Pride in Place in which you or your spouse, civil partner or equivalent have a beneficial interest.”

- Land excludes an easement, servitude, interest or right in or over land which does not carry with it a right for you or your spouse, civil partner or equivalent (alone or jointly with another) to occupy the land or to receive income.

Please ensure that:

- you give the address or a brief description to identify the land and property
- if you live in the area of the Pride in Place of which you are a member or co-opted member, you include your home under this heading as owner, lessee or tenant

Please remember that:

- this provision is likely to include the address where you live
- the requirement relates only to land in the area of the Pride in Place in respect of which you are making the notification

Section 5: Licences

You must include details of, “any land which is within the area of Pride in Place for which you or your spouse, civil partner or equivalent hold a licence (alone or jointly with others) to occupy for a month or longer.”

Please ensure that you give the address or a brief description to identify the land.

Section 6: Corporate Tenancies

You must include details of, “any tenancy where (to your knowledge)

- the landlord is the Pride in Place of which you are a member or co-opted member and;
- the tenant is a body in which you or your spouse, civil partner or equivalent have a beneficial interest.”

Please note:

- A body in which you or your spouse, civil partner or equivalent have a beneficial interest means a firm in which you/they are a partner, or a body corporate of which you/they are a director, or in the securities of which you/they have a beneficial interest.
- “Director” includes a member of the committee of management of an industrial and provident society.

Section 7: Securities

You must include details of, “any beneficial interest of you or your spouse, civil partner or equivalent in securities of a body where:

That body (to your knowledge) has a place of business or land in the area of the Pride in Place of which you are a member or co-opted member, and either,

- the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or
- if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you or your spouse, civil partner or equivalent have a beneficial interest exceeds one hundredth of the total issued share capital of that class."

Please note:

- "Securities" means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society
- You do not have to show the extent of your interest.

Section 8-Gifts and Hospitality

Please register any gifts or hospitality offered, whether accepted or declined, with an estimated value of £50 or above. There is a separate form to complete for this, which will be supplied by the Monitoring Officer on request.

Part B-Other Registerable Interests

Section 9

In this section of the form, you are required to disclose:

- any unpaid directorships
- anybody of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority
- any body
 - (i) exercising functions of a public nature
 - (ii) directed to charitable purposes or
 - (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management

