

(From the Worcestershire LEP Assurance Framework)

Appendix 7 - Conflicts of Interest Policy

Introduction

This policy exists to ensure that any conflicts of interest which may arise in the Worcestershire LEP's decision-making processes are managed and recorded properly. This protects the integrity of our decision-making processes, enables stakeholders to have confidence in our decision-making, and protects the reputation of the LEP and members of its boards.

The policy should be read alongside the Standards of Conduct Policy for Worcestershire LEP.

Scope

This policy applies to all members of LEP Decision Making Groups ('members') making investment decisions involving public money as identified in Figure 1 – WLEP Organisational Structure.

Definition

An "interest" may include employment, other appointments (including trusteeships, directorships, elected office), memberships (whether corporate or personal), investments, shareholdings, land and property, intellectual property, customer/client relationships, use of the LEP's services or anything else which could (or could be perceived to) impact on the member's ability to act independently.

This list is not exhaustive, and the presumption should be in favour of including anything which could conceivably be considered to be an interest, even if it is felt unlikely to arise.

Policy

The policy is in two parts:

- Maintaining a record of all interests
- Managing potential conflicts of interest

Maintaining a record of all interests

The LEP Executive will maintain a Register of Interests covering all Members and these will be renewed in January of each year.

Members are required to update their forms if any new interests arise during the year.

The LEP Executive will publish an up-to-date Register of Interests on the LEP website at www.wlep.co.uk/

Managing potential conflicts of interest

Potential conflicts of interest, including perceived conflicts of interest, may arise for in scope members when participating in the LEP's decision-making processes.

The LEP Executive will ensure that there is a standing item, "Declarations of Interest", at the start of the agenda for every meeting of an in scope group. Members should declare any potential conflicts of interest for the meeting at this point, and again when the relevant item is reached on the agenda, regardless of whether this is included in the Register of Interests.

The LEP Executive will ensure that all such declarations are recorded in the minutes of the meeting.

Whenever a conflict of interest, or potential conflict of interest, arises, the affected member will not be

- (a) entitled to participate in the discussion of that matter;
- (b) entitled to remain in the room for the discussion of that matter;
- (c) counted in the quorum for that part of the meeting;
- (d) entitled to vote on the matter

Notwithstanding the above, at the discretion of the non-conflicted members, the conflicted member may be allowed to remain present for the applicable part of the meeting so long as the interest is declared and they do not participate in the vote on the matter."

Where decisions are made by written procedure, any in scope member with a conflict of interest or potential conflict of interest should immediately notify the LEP Executive and take no part in the voting. The LEP Executive will record this.

Minutes of all in scope meetings will be published on the LEP website at www.wlep.co.uk/

Policy for members of the LEP Executive

Members of the LEP Executive employed by Herefordshire and Worcestershire Chamber of Commerce ('the Chamber') on behalf of the LEP are required to abide by the Chamber's Code of Conduct.

The LEP Chief Executive maintains a register of interests declared by staff, which is updated annually in accordance with the Chambers policy.

Staff seconded to the LEP are required to follow the Chamber's Code of Conduct in addition to their own organisations, and must also include their interests on the register.