

Humber LEP Conflicts of Interest Policy

March 2019

1. Introduction

- 1.1. This policy exists to ensure that any conflicts of interest which may arise in the Humber 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.
- 1.2. The policy should be read alongside the LEP's Member Code of Conduct, which incorporates the Seven Principles of Public Life ("the Nolan Principles"), which all board, sub-board, panel and group members are required to abide by.
- 1.3. The policy is referenced in, and supports, the LEP's Assurance Framework.
- 1.4. The policy applies to any/all involvement with the work of the LEP.

2. Definitions

- 2.1. The definitions of "pecuniary interest", "nonpecuniary interest" and "sensitive interest" are provided in the Member Code of Conduct.
- 2.2. For the purposes of this policy, a "Relevant Group" means the LEP Board, sub-boards, Investment Panel and any other LEP groups which have a role in making recommendations or decisions involving public funds or resources.

3. Conflicts of Interest Policy

- 3.1. The Humber LEP recognises that the nature of our work and the way we involve people in it means that it is inevitable that perceived or actual conflicts of interest will occur. The interests people who work with us have in our area, such as owning businesses or being elected councillors, mean they are able to contribute their knowledge and skills and we are able to work in partnership with a wide range of organisations.
- 3.2. The way we manage conflicts of interest ensures that people with knowledge and skills can voluntarily contribute their time to support our work, without that affecting our ability to take objective decisions.
- 3.3. We do this by ensuring that interests are recorded for the general public to see, and that when a potential conflict of interest arises it is managed so as not to affect the decision-making process.
- 3.4. The policy is in two parts:
 - a) Maintaining a record of all interests

b) Managing potential conflicts of interest

3.5. Maintaining a record of all interests

- 3.5.1. The LEP Executive will maintain a Register of Interests covering all members of Relevant Groups.
- 3.5.2. Members will complete a form listing their interests upon joining a Relevant Group for the first time. This must be completed within 28 days of taking up the post, and before advising or participating in any decision-making.
- 3.5.3. The LEP has adopted the bespoke pro-forma provided by Government. The completed forms are published on the LEP's website.
- 3.5.4. The LEP Executive will require all members to update their forms annually, and will carry out a mid-year check for any missing changes.
- 3.5.5. Members should proactively update their forms if any new interests arise during the year. This should be as soon as practically possible and within 28 days of the interest occurring.
- 3.5.6. Register of Interest forms will be signed by the Member, and signed by the LEP Chief Executive to confirm receipt. Copies will be provided to the accountable body's Section 151 Officer.
- 3.5.7. Signed forms will be retained for the LEP's records. The LEP Executive will publish the forms, with signatures redacted, on the LEP website.

3.6. Managing potential conflicts of interest

- 3.6.1. Potential conflicts of interest, including perceived conflicts of interest, may arise for members when participating in the LEP's decision-making processes.
- 3.6.2. Members are required to take personal responsibility for declaring their interests before any decision is taken. Each Board Member must review their individual register of interests before each board meeting and decision-making committee meeting, submitting any necessary revisions to the LEP at the start of the meeting.
- 3.6.3. The LEP Executive will ensure that there is a standing item, "Declarations of interest", at the start of the agenda for every meeting of a Relevant Group. The chair will remind Members to declare any potential conflicts of interest (pecuniary or nonpecuniary) for the meeting at this point, and again when the relevant item is reached on the agenda, regardless of whether these are included in the Register of Interests.
- 3.6.4. The LEP Executive will ensure that all such declarations are recorded in the minutes of the meeting, along with the action taken.

3.6.5. Whenever a conflict of interest, or potential conflict of interest, arises, the member will not be:

- entitled to participate in the discussion of that matter
- entitled to remain in the room for the discussion of that matter
- counted in the quorum for that part of the meeting
- entitled to vote on the matter

3.6.6. Notwithstanding the above, at the discretion of the Chair the 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.

3.6.7. Where decisions or recommendations are made by written procedure, any 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.

4. Policy for members of the LEP Executive

4.1. Members of the LEP Executive employed by Hull City Council on behalf of the LEP are required to abide by the Council's Code of Conduct.

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

4.3. All senior officers, and officers involved in decision-making, are required to also complete the bespoke pro-forma provided by Government. Senior officers' forms are published on the LEP's website.

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