

Conflicts of Interest Policy

1. Introduction

- 1.1. This policy exists to ensure that any conflicts of interest which may arise in the HEY 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 Seven Principles of Public Life ("the Nolan Principles"), which all board members are required to abide by. These are appended to this Policy for reference.

2. Definition

- 2.1. 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.

3. Policy for board members

- 3.1. The policy is in two parts:

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

3.2. Maintaining a record of all interests

- 3.2.1. The LEP Executive will maintain a Register of Interests covering all members of the LEP Board, sub-boards and panels, as well as any other constituted LEP groups which make decisions or recommendations involving public money.
- 3.2.2. Members will complete a form listing their interests upon joining a constituted LEP group for the first time.
- 3.2.3. The LEP Executive will ask all members to update their forms annually.
- 3.2.4. Members should proactively update their forms if any new interests arise during the year.

3.2.5. The LEP Executive will publish an up-to-date Register of Interests on the LEP website.

3.3. Managing potential conflicts of interest

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

3.3.2. 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 constituted 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.

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

3.3.4. 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

3.3.5. 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.

3.3.6. 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 are 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 Operating Officer maintains a register of interests declared by staff, which is updated annually in accordance with the Council's policy.

- 4.3. 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.

The Seven Principles of Public Life

The following principles have been set out by the Committee on Standards in Public Life:

Selflessness

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.