



GREATER LINCOLNSHIRE LEP

Conflict of Interest Policy

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Purpose	To explain the rules governing conflict of interest for LEP Directors, Members, Officers and other relevant stakeholders
Author	Operations & Delivery Executive Manager
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Policy lead officer	LEP Chief Executive

Version Control

Please note this document is valid until formally revoked or replaced

Version	Date	Changes
2.0	July 2022	Implementation of new template and creation of new stand-alone Conflict of Interest Policy Removal of Code of Conduct and Declaration of Interest forms (separate forms now created) Gender specific terms replaced with gender neutral terms

CONFLICT OF INTEREST POLICY

1. INTRODUCTION

- 1.1. This policy governs the definitions and processes in place to manage any perceived or actual conflict of interest, to ensure that integrity of the Greater Lincolnshire Local Enterprise Partnership (GLLEP) decision-making process is protected. This provides stakeholder confidence in GLLEP decision-making, and protects the reputation of the GLLEP and its Directors, Members, and Strategic Advisory Board Members.
- 1.2. In addition, all Directors, Board members and Officers are required to abide by the Seven Principles of Public Life (the “Nolan Principles”). These are:
 - 1.2.1. Selflessness: Holders of public office should act solely in terms of the public interest;
 - 1.2.2. 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;
 - 1.2.3. Objectivity: Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias;
 - 1.2.4. 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;
 - 1.2.5. 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;
 - 1.2.6. Honesty: Holders of public office should be truthful; and
 - 1.2.7. Leadership: Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

2. APPLICABILITY

- 2.1. This policy applies to GLLEP Board Directors, GLLEP officers, and members of Strategic Advisory Boards, committees, groups and any co-opted members or advisors to the GLLEP.
- 2.2. GLLEP Officers who are employed by Lincolnshire County Council (LCC) must also abide by the relevant LCC policies and procedures.

3. DEFINITIONS

3.1. Conflict of Interest

A situation in which one cannot make a fair decision because one may be affected by the result due to competing interests or loyalties.

3.2. Interest

An interest in a matter where there is a reasonable likelihood of the individual or parties being affected by the decision, either directly or indirectly. This may include gain or loss to the individual or parties which would not have happened had the interest not existed. Interests may be associated with, for example, employment, other appointments (including trusteeships, directorships, elected office), memberships (whether corporate or personal), investments, shareholding, land and property, intellectual property, customer/client relationships, use of GLLEP's services, or anything else which could (or could be perceived to) impact on the individual or party's ability to act fairly, independently, impartially and in the public interest.

3.3. Pecuniary Interest

An interest through where there is a reasonable likelihood or expectation of appreciable financial loss or gain, as defined in the [Localism Act 2011](#) and The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012.

3.4. Non-pecuniary Interest

Any interest which is not listed in the [Schedule to The Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012 \(No.1464\)](#). Non-pecuniary interests do not have a financial or other material component. They may arise from personal or family relationships or involvement in sporting, social or cultural activities.

3.5. Sensitive Interest

Described in the [Localism Act 2011](#) as a member or co-opted member of an authority having an interest, and the nature of the interest being such that the member or co-opted member, and the authority's monitoring officer, consider that disclosure of the details of the interest could lead to the member or co-opted member, or a person connected with the member or co-opted member, being subject to violence or intimidation.

4. DUTY TO AVOID CONFLICTS OF INTEREST

- 4.1. GLLEP Board Directors' must avoid situations where they can, or have, a direct or indirect interest that conflicts, or possibly may conflict, with the interests of the GLLEP.
- 4.2. This applies in particular to the exploitation of any property, information or opportunity. It is immaterial whether the GLLEP could take advantage of the property, information or opportunity in question.

5. CONFLICT OF INTEREST MANAGEMENT PROCESS

- 5.1. All relevant stakeholders, as detailed in [section 2](#), will, within 28 days of commencement with the GLLEP, complete a Declaration of Interest form. This will notify the GLLEP Chief Executive and Accountable Body's S151 officer of any:
 - 5.1.1. Disclosable pecuniary interest, where the pecuniary interest is theirs or their spouses or civil partner's or is the pecuniary interest of somebody with whom they are living with as a spouse, or as if they were civil partners.
 - 5.1.2. Non-pecuniary interest which the GLLEP has decided should be included in the register or which the GLLEP consider should be included if they are to fulfil their duty to act in conformity with the Seven Principles of Public Life. These non-pecuniary interests will necessarily include their membership of any Trade Union.
- 5.2. Following any disclosure of an interest not on the GLLEP register or the subject of pending notification, the individual or party must notify the GLLEP Chief Executive and S151 Officer of the interest within 28 days beginning with the date of disclosure.
- 5.3. GLLEP Director's Interest Declarations will be published on the GLLEP website on each Director's profile page.
- 5.4. Interest Declarations will be updated annually, and also when any changes occur.
- 5.5. Declarations of conflicts relating to meeting agenda items will be a standing item at the start of all GLLEP Board, Statutory Board and Strategic Advisory Board meetings.
- 5.6. GLLEP Board Directors should review their individual register of interest before each board meeting and decision-making committee meeting. If a disclosable interest has not been entered onto the GLLEP's register, then the member must disclose the interest at any meeting of the GLLEP at which they are present, provided that the matter is not a 'sensitive interest'.

- 5.7. Unless dispensation has been granted, GLLEP Board Directors' must not participate in any discussion of, vote on, or discharge any function related to any matter in which they have a pecuniary interest. Additionally, GLLEP Directors' Board members must observe the restrictions the GLLEP places on their involvement in matters where they have a pecuniary or non-pecuniary interest as defined by the GLLEP.
- 5.8. All decisions under a conflict of interest will be recorded by the Board and reported in the minutes of the meeting. The minutes will record:
- 5.8.1. The nature and extent of the conflict;
 - 5.8.2. An outline of the discussion;
 - 5.8.3. The actions take to manage the conflict.