

Register of Interests Policy

South East Local Enterprise Partnership (SELEP)

Version: agreed 29th June 2018

1. Introduction

1.1 You are a member of the South East Local Enterprise Partnership (SELEP) and your actions will impact on how the SELEP as a whole is viewed and your actions can have both a positive and negative impact on the SELEP. It is essential that the SELEP can demonstrate the highest standards of probity in all activity. There must therefore be transparency on the part of those who are in a position of authority, power or influence.

1.2 As a Member of the SELEP it is your responsibility to comply with the provisions of this Policy.

1.3 This Policy applies to all SELEP Members and their nominated representatives.

1.4 This Policy also applies to the SELEP Managing Director and the Deputy Managing Director and any members of staff involved in advising Board Members on decisions of the SELEP Boards; this includes, as a minimum, all members of the SELEP Senior Officer Group and the SELEP Directors' Group. As a minimum, all applicable staff should review their interests every six months, or as required by this Policy in relation to new interests pertaining to a meeting or decision.

2. Definitions

2.1 In this Policy the following phrases have the following meanings:

2.1.1 **'body controlled by the SELEP'** - means a company or similar organisation where any member of the SELEP owns a majority of the shares or is entitled to nominate a majority of the members or directors or any company owned by such a body.

2.1.2 **'body in which the relevant person has a beneficial interest'** - means a firm in which you or your spouse or partner is a partner or a body corporate of which the relevant person is a director (whether or not remunerated), or in the securities of which you or your spouse or partner have a beneficial interest.

2.1.3 **‘Code Interest’** – means those additional interests and relationships set out in 7.2 below, which are not covered by Disclosable Pecuniary Interests, and which the SELEP have determined as being so significant that they should be registered.

2.1.4 **‘Disclosable Pecuniary Interest’** - is an interest defined as such by the Localism Act 2011 or regulations made thereunder.

The SELEP is made up of representatives from both local authorities and local businesses. Whilst it is acknowledged that the principles of the Localism Act 2011 do not apply to business partners, the SELEP have adopted those principles relating to disclosable pecuniary interests so that they are applicable to all Members of the SELEP.

2.1.5 **‘any member of the SELEP’** – means all local authorities and business partners who make up the membership of the South East Local Enterprise Partnership.

3. Registration of Interests

3.1 You are required to register details of your Disclosable Pecuniary Interests and your Code Interests, within 28 days of becoming a Member of the SELEP in the Register of Members’ Interests held by the Secretariat.

3.2 You must keep your entry in the register of interests up to date by notifying the SELEP Managing Director of any changes to your interests within 28 days of the change occurring.

3.3 You must review your register of interests before each board meeting and decision making committee meeting, submitting any necessary revisions to the SELEP Secretariat and representative of the Accountable Body S151 Officer at the start of the meeting.

3.4 A copy of the form required to be completed to register your interests is attached at the end of this Policy and can also be downloaded from the SELEP website here:

<http://www.southeastlep.com/about-us/our-policies>

3.5 The SELEP Managing Director will report, on at least a quarterly basis, to the s151 Officer of the Accountable Body, to confirm receipt of a register of interest from each SELEP board member and notification of whether any amendments have been made since the previous report.

4. Publication of the Register of Interests

4.1 The Managing Director will arrange for the Register of Interests to be published on the SELEP's website.

4.2 Where the nature of one or more of your interests is such that you and the Managing Director consider that disclosure of details of the interest could lead to you, or a person connected with you, being subject to violence or intimidation then copies of the Register will be available for inspection. Any published version of the Register will not include that specific detail but shall state that you have declared an interest, details of which have been withheld in accordance with this Policy.

4.3 You must notify the Managing Director within 28 days of becoming aware of any change of circumstances which means that information excluded from the register under 4.2 is no longer sensitive information.

4.4 You must review your entry on the register of interests annually and notify the Managing Director of any changes.

5. Declaration of Interests at Meetings

5.1 A meeting means any meeting of the SELEP including Strategic Board, Accountability Board, and meetings held within the Federated Areas.

5.2 Where any matter to be considered at a meeting of the SELEP at which you are present which relates to or may have an impact upon a body or matter in which you have a Disclosable Pecuniary Interest or a Code interest, you must disclose the existence and nature of that interest to the meeting.

5.3 Where a Disclosable Pecuniary Interest declaration has been made, you must:

5.3.1 withdraw from the room where the meeting considering the business is being held at the time that item of business is being discussed; and

5.3.2 not participate in any debate or vote on the matter.

5.4 When declaring an interest at a meeting you need not disclose the nature of the interest if you and the Managing Director have agreed that it ought not to appear on the public register of interests, but you must otherwise comply with the rules about declarations of interest.

5.5 Board Members are required to declare an interest on decisions, irrespective of whether or not they are able to attend the meeting at which the decision is to be taken.

Where a Board member declares an interest, a substitute member is unable to vote on their behalf.

5.6 All declarations of interest made at meetings will be recorded together with any actions undertaken by SELEP as a result of the declaration. This record will form part of the formal minutes of the meeting and which are published on the SELEP website.

6. Disclosure of Interests in Discussions and Correspondence

6.1 If you have an interest in any matter which would require you to declare it at a meeting, and that matter is raised in any discussion or correspondence, whether in person, by telephone or email or otherwise, with any member, employee, contractor or agent of the SELEP you must:

6.1.1 make a full disclosure of that interest at the outset of any discussions or correspondence, or as soon as the matter is raised; and

6.1.2 not seek improperly to influence a decision about that matter.

7. Interests to be Declared and Registered

7.1 You have a Disclosable Pecuniary Interest if you or your partner has an interest in the following:

7.1.1 Any employment, office, trade, profession or vocation carried on for profit or gain;

7.1.2 Any payment or provision of any other financial benefit (other than from the SELEP) made or provided within the previous twelve months in respect of any expenses incurred by the member in carrying out duties as a Member, or towards election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992;

7.1.3 Any contract for goods, services or works which has not been fully discharged between the relevant person (or a body in which the relevant person has a beneficial interest) and any member of the SELEP;

7.1.4 Any beneficial interest in any land in the SELEP's area;

7.1.5 Any licence of any land in the SELEP's area (alone or jointly with others) to occupy land for a month or longer;

7.1.6 Any tenancy where to the Member's knowledge (a) the landlord is any member of the SELEP and (b) the tenant is a body in which a relevant person has a beneficial interest;

7.1.7 Any beneficial interest in securities of a body where:

- a. that body (to the Member's knowledge) has a place of business or land in the area of the SELEP; and
- b. either:
 - i. the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or
 - ii. 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 the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

7.2 Further the SELEP have determined that you will also have an interest, known as a Code Interest, in matters falling within any of the descriptions below:

7.2.1 Any contract for goods, services or works which has not been fully discharged between you, your spouse or partner or a body in which the relevant person has a beneficial interest and a body controlled by any member of the SELEP;

7.2.2 Any contract with any member of the SELEP which has expired within the last 2 years and which was, when it was in force, a Disclosable Pecuniary Interest.

7.2.3 Any tender, bid or quotation submitted within the last 2 years to any member of the SELEP which would, if accepted, have amounted to a disclosable pecuniary interest. Tenders, bids or quotations are not required to be registered until 28 days after the last date for the submission of tenders, bids or quotations.

7.2.4 Any body of which you are a member or in which you hold a position of general control or management and to which you have been appointed or nominated by any member of the SELEP;

7.2.5 Any other body of which you are a member or in which you hold a position of general control or management -

- a. which exercises functions of a public nature;
- b. which is directed to charitable purposes; or
- c. one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union);

7.2.6 Any matter which might reasonably be regarded as affecting the well-being or financial position of:



- a. yourself;
- b. a body in which you have a Disclosable Pecuniary Interest or a Code Interest;
or
- c. a friend, relative or close associate;
to a greater extent than the majority of other members of the public affected
by the decision.

SELEP Local Enterprise Partnership

Register of Members' Interests

As a Board Member/Co-opted Member of the South East Local Enterprise Partnership (SELEP), I declare that I have the following disclosable pecuniary and/or non-pecuniary interests. (Please state 'None' where appropriate, do not leave any boxes blank)

***Spouse/Partner** – In the notice below my spouse or partner means anyone who meets the definition in the [Localism Act](#), i.e. my spouse or civil partner, or a person with whom I am living as a spouse or a person with whom I am living as if we are civil partners, and I am aware that that person has the interest having carried out a reasonable level of investigation. Where your spouse or partner has recently been involved in any activity which would have been declarable, this should be mentioned, with the date the activity ended.

Section 1	Any Employment, Office, Trade, Profession or Vocation Carried On For Profit Or Gain	Myself	Spouse/Partner*
1.1	Name of: <ul style="list-style-type: none"> - your employer(s) - any business carried on by you - any other role in which you receive remuneration(this includes remunerated roles such as councillors). 		
1.2	Description of employment or business activity.		
1.3	The name of any firm in which you are a partner.		
1.4	The name of any company for which you are a remunerated director		

Section 2	Sponsorship	Myself	Spouse/Partner*
2.1	<p>Any financial benefit obtained (other than from the LEP) which is paid as a result of carrying out duties as a Member.</p> <p>This includes any payment or financial benefit from a Trade Union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992 (a)</p>		

Section 3	Contracts	Myself	Spouse/Partner*
3.1	Any contract for goods, works or services with the LEP which has not been fully discharged by any organisation named in 1.1.		
3.2	Any contract for goods, works or services entered into by any organisation named at 1.1 where either party is likely to have a commercial interest in the outcome of the business being decided by the LEP.		

Section 4	Contracts	Myself	Spouse/Partner*
4.1	<p>Any beneficial interest you or any organisation listed at 1.1 may have in land or property which is likely to be affected by a decision made by the LEP in a forthcoming meeting.</p> <p>This would include, within the area of the LEP:</p> <ul style="list-style-type: none"> • Any beneficial interest in any land in the LEP areas, including your place(s) of residency • Any tenancy where the landlord is the LEP and the tenant is a body in which the relevant person has an interest • Any licence for a month or longer to occupy land owned by the LEP <p>For property interests, please state the first part of the postcode and the Local Authority where the property resides. If you own/lease more than one property in a single postcode area, please state this.</p>		

Section 5	Contracts	Myself	Spouse/Partner*
5.1	<p>Any interest in securities of an organisation under 1.1 where:-</p> <ul style="list-style-type: none"> a) that body (to my knowledge) has a place of business or land in the area of the LEP; and b) either: <ul style="list-style-type: none"> I. the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or II. 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 I have an interest exceeds one hundredth of the total issued share capital of that class. 		

Other Interests

Membership of Organisations

I am a member of, or I am in a position of general control, a trustee of, or participate in the management of (*please state the organisation*):

1. Any body to which I have been appointed or nominated by the SELEP:

2. Any body exercising functions of a public nature (e.g. school governing body or another LEP):

3. Any body directed to charitable purposes:

4. Any body, one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union):

5. Any local authority (please state any interests you hold as LA leaders/cabinet members for LA land, resources and the LA's commercial interests):

6. Any other interest which I hold which might reasonably be likely to be perceived as affecting my conduct or influencing my actions in relation to my role.

MEMBER'S DECLARATION AND SIGNATURE



I confirm that:

- having carried out reasonable investigation, the information given above is a true and accurate record of my relevant interests, given in good faith and to the best of my knowledge;
- I shall review this register of interests before each board meeting and decision making committee meeting, submitting any necessary revisions to the SELEP Secretariat and representative of the Accountable Body S151 Officer at the start of the meeting;
- Even if a meeting has not taken place I shall, within 28 days of becoming aware of any change to the interests specified above, provide written notification to the SELEP Secretariat and the Accountable Body S151 Officer, of that change;
- I have done and shall continue to comply with all other SELEP policies, including, but not limited to, the Code of Conduct and the Gifts and Hospitality policy; I understand that all of the policies are available on the SELEP website.

Name		Date received by SELEP [to be completed by SELEP]
Signature		
Date		