

Conflict of Interest Policy

1. Introduction

- 1.1. The SELEP Ltd (SELEP) prides itself on high levels of openness and transparency.
- 1.2. This policy applies to the following Board members:
 - a) Directors;
 - b) Members; and
 - c) substitutes for Members and/or Directors.
- 1.3. This policy applies to the following officers:
 - a) the SELEP Secretariat;
 - b) the Senior Officers' Group; and
 - c) the Directors' Group.
- 1.4. This policy applies to the following meetings:
 - a) Strategic Board;
 - b) Accountability Board;
 - c) Investment Panel;
 - d) Federated Boards;
 - e) any other working group, sub-committee or other delegated committee of a-d.
- 1.5. Relevant interests must be registered on a Register of Interests form, and also declared at the outset of any meeting to allow for appropriate action to be taken (4 below).

2. Relevant Interests

- 2.1. Pecuniary Interests include:
 - a) any employment, office, trade, profession or vocation carried on for profit or gain;
 - b) any payment or provision of any other financial benefit (other than from the SELEP) which is paid as a result of carrying out duties as any of the roles listed at 1.2 or 1.3 (including from a Trade Union);
 - c) any contract with you, or an organisation with whom you have an interest, for goods, works or services with the SELEP (or third party if either party is likely to have a commercial interest in the outcome of SELEP decisions) which has not been fully discharged;
 - d) any property or land owned, leased, rented or licensed by you or any organisation with whom you have an interest (excluding councils) in the SELEP area;
 - e) any interest in the financial securities (shares) of an organisation with whom you have an interest that:
 - i) has a place of business or land in the area of the SELEP; and
 - ii) either:
 - the total nominal value of the securities exceeds £25,000 or 1% of the total issued share capital of that body; or
 - 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 exceeding 1% of the total issued share capital of that class.

- 2.2. Non-pecuniary interests include:
- a) 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;
 - b) any other body of which you are a member or in which you hold a position of general control or management which:
 - i) exercises functions of a public nature;
 - ii) is directed to charitable purposes; or
 - iii) has a principal purpose that includes the influence of public opinion or policy (including any political party or trade union);
- 2.3. Other miscellaneous relevant interests include:
- a) any matter which might reasonably be regarded as affecting the well-being or financial position of yourself, a close friend/relative/associate or a body in which you hold an interest, to a greater extent than the majority of other members of the public affected by the decision;
 - b) any contract with SELEP or any Board member or officer of the SELEP which has expired within the last 2 years and which was, when it was in force, a pecuniary interest;
 - c) any tender, bid or quotation submitted within the last 2 years to SELEP or any Board member or officer of the SELEP which would, if accepted, have amounted to a pecuniary interest.
- 2.4. Council Representatives on the Strategic and Accountability Boards are not required to declare interests held by their Council. Council-held interests do not automatically affect their ability to join discussions or vote, unless there is an individual conflict or perceived conflict of interest as a result of the Council-held interest. Members are required to declare interests relating to themselves as an individual, which may preclude the Member from joining the discussion and/or voting in accordance with this policy.

3. Registers of Interests

- 3.1. You are required to register details of your interests within 28 days of the commencement of any position listed at 1.2 and 1.3 and/or before taking part in any decision-making, including all meetings listed at 1.4.
- 3.2. It is your responsibility to keep your Register of Interests up to date. Any changes must be registered within 28 days of the change and/or before taking part in any decision-making, including all Board meetings.
- 3.3. Registers of Interest must be reviewed and re-submitted at least annually.
- 3.4. The Registers of Interests of Board members will be publicly available on the website.
- 3.5. The Registers of Interests of officers will not be published on the website, but may be subject to FOI requests.
- 3.6. If you have an interest that you need to keep confidential as the public disclosure of the details could lead to you, or a person connected to you, being subject to violence or intimidation, then with permission of the CEO, these details can be withheld from publication. The details will be held with the Secretariat and the public version will state that an interest has been declared, but that the details have been withheld in accordance with this policy. You must notify the Secretariat within 28 days if this exemption is no longer needed.

4. Declarations of Interests at Meetings

- 4.1. You must declare any interests (as listed at 2) relevant to a meeting agenda at the beginning of such meeting.

- 4.2. You must also declare any interests (as listed at 2) relevant to an Accountability or Strategic Board or Investment Panel meeting agenda at least 24 hours in advance of attending such meeting to hello@southeastlep.com.
- 4.3. Where a Pecuniary Interest declaration has been made in relation to an agenda item, you must:
 - a) withdraw from the room where the meeting is being held during that item; and
 - b) not participate in any debate or vote on the matter.
- 4.4. If you have an interest relevant to the agenda that is covered by the exception under 3.6 above, you must inform the SELEP Secretariat (or Federated Board lead officer for a Federated Board meeting) at least 24 hours in advance. It will be declared at the beginning of the meeting that you have an interest and appropriate action will be taken, without disclosure of the details to the Board.
- 4.5. Board members are required to declare all interests relating to an agenda, irrespective of whether or not they are able to attend the meeting at which the decision is to be taken.
- 4.6. Substitutes must declare their own interests as well as any interests of the Board member they are substituting.
- 4.7. Where a Board member declares a pecuniary interest, a substitute member cannot discuss the item or vote on their behalf and must follow the protocol at 4.3 above
- 4.8. All declarations of interests made at meetings will be audio recorded and recorded in the formal minutes, together with any actions undertaken as a result of the declaration, and published on the SELEP website.

5. Disclosure of Interests in Discussions and Correspondence

- 5.1. 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:
 - a) make a full disclosure of that interest at the outset of any discussions or correspondence, or as soon as the matter is raised; and
 - b) not seek improperly to influence a decision about that matter.