

Suffolk Business Board Conflicts of Interest Policy

This Conflicts of Interest Policy applies to individuals who have been appointed to the Suffolk Business Board. As a Board with significant influence over the decision-making processes at the County Council, it is necessary to ensure there is public confidence and transparency in the decision making and advice offered by the Business Board.

This Policy is intended to protect both Business Board members, and the Council, from any appearance of impropriety and to demonstrate transparency to the public and other interested parties.

This Policy will apply at all times when individuals might reasonably be perceived to be acting on behalf of or representing the Business Board but not otherwise.

Key principles

- Business Board members must act in a manner consistent with the Suffolk County Council Code of Conduct [suffolk-county-council-code-of-conduct.docx](#).
- Business Board members must act solely in the public interest and should not take part in discussions or decisions where they have a financial interest or other conflict of interest.
- Business Board members must not place themselves under a financial or other obligation to outside individuals or organisations that might be reasonably considered as an influence upon them in performance of their duties to the Business Board.
- Business Board members must declare and register any private interests, both financial and non-financial, including membership of any body, organisation or political party that relates to their participation in Business Board activities.
- Where Business Board members have an interest in any item of business at a relevant meeting of the Business Board, they must declare that interest and withdraw from the meeting, taking no further part in the discussions. All such declarations and the reasons for them will be recorded in the minutes.
- Where confidential information is shared in Board papers or Board discussions, Board members must ensure this information is not disclosed outside of agreed parameters.

Register of Interests

1. Members of The Business Board must declare any private interests, both pecuniary and non-pecuniary, including membership of any Trade Union, political party or local authority, directorships, industry lobby groups and any significant shareholdings that relate to Business Board duties. Furthermore, they must take steps to resolve any conflicts arising in a way that protects the public interest. It is left to individual Members to give the required information; each Member is ultimately responsible for their own entry. Members should also register the interests of spouses/partners living in the same household as the Member.
2. The Business Board Members' register of interest declarations will be made available on The Suffolk Economy website. If an interest has not been entered onto the Business

Board's register, then the member must disclose the interest at any meeting of the Business Board at which they are present, where they have a disclosable interest in any matter being considered and where the matter is not a 'sensitive interest'.

3. Unless dispensation has been granted, Business Board Members may not participate in any discussion of, vote on, or discharge any function related to any matter in which they have a pecuniary interest.

Categories of Interests

Interests are registered under six categories, which are represented by the following non-exhaustive headings:

1. **Any employment, Office, trade, Profession or Vocation carried on for profit or gain.**
2. **Sponsorship.**
3. **Contracts.**
4. **Land or Property.**
5. **Securities.**
6. **Gifts & Hospitality.**

Identifying Conflicts of Interests

Conflicts can inhibit open discussions and may result in decisions being taken that are not in the best interests of the Business Board. Conflicts may arise, for instance, where a member's personal interests, as a shareholder in a company that is a potential beneficiary of funding, conflict with the interests of the Business Board.

Dispensations and Managing Conflicts

The Board brings together a range of deep experience, knowledge and opinion, with Board members representing various segments of the Suffolk economy. Naturally some Board members will have stronger associations with certain topics and will look to advocate their industry. Whilst this is to be expected, there may be some scenarios where interest materially affects a member's ability to recommend an appropriate course of action; this will be deemed a conflict of interest. In such circumstances the Member will withdraw from the meeting during the discussion and any decisions take place.

Upon the declaration of any conflicts of interest at a meeting of the Board, the non-conflicted Members will:

1. assess the nature of the conflict;
2. assess the risk or threat to Member decision making;
3. decide whether the conflict is non-trivial (that is, it is material or has the potential to be detrimental to decisions taken by the Board); and
4. decide what steps to take to avoid or manage the conflict.

The conflicted Member must not take part in the discussion or decision and will not be counted when determining whether the Board meeting is quorate. If the non-conflicted Members consider that the

declared conflict is trivial, they may agree that the conflicted Member may continue to participate in discussions and the decision-making process.

If the non-conflicted Members consider that the conflict is non-trivial, the non-conflicted Members will determine what action is appropriate in light of the nature and extent of the conflict. A number of steps can be taken to deal with the conflict, including:

1. excluding the conflicted Member from discussions in relation to the matter to avoid inadvertently influencing the non-conflicted Members;
2. excluding the conflicted Members from decision-making in relation to the matter while the conflict exists;
3. delegating the matter to a sub-committee of non-conflicted Members;
4. seeking independent advice to help with a decision;
5. appointing an alternative, non-conflicted Member;
6. resignation of the conflicted Member where the conflict is acute or pervasive.

The Chair of the Business Board will inform the conflicted Member of the non-conflicted Members' decision. The secretary of the Board will note in the minutes of the meeting the conflict declared, an outline of the discussion and the actions taken to manage the conflict.

Register of Interests

As a member of the Suffolk Business Board, 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).

Section 1	Employment, office, trade, profession or vocation for profit or gain	Business Board Member	Spouse or Partner
1.1	Name of: - your employer(s) - any business carried on by you - any other role in which you receive remuneration (this includes remunerated roles such as councilors)		
1.2	The name of any firm in which you are a partner		
1.3	The name of any company for which you are a remunerated director		
Section 2	Sponsorship	Business Board Member	Spouse or Partner
2.1	Any financial benefit obtained which is paid as a result of carrying out duties as a member of the Business Board. This includes any payment or financial benefit from a Trade Union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992		
Section 3	Contracts	Business Board Member	Spouse or Partner
3.1	Any contract for goods, works or services with Suffolk County Council which has not been fully discharged by any organisation named at 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 reviewed by the Suffolk Business Board in an upcoming meeting.		

Section 4	Land and Property	Business Board Member	Spouse or 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 recommendations made by the Business Board in an upcoming meeting. This would include, within the area of the County Council:</p> <ul style="list-style-type: none"> - Any beneficial interest in any land in the Area of the County Council (and/or Non-Constituent Councils], including your place(s) of residency - Any tenancy where the landlord is the County Council and the tenant is a body in which relevant person has a beneficial interest - Any license for a month or longer to occupy land owned by the County Council 		
Section 5	Securities	Business Board Member	Spouse or Partner
5.1	<p>Any beneficial interest in securities of an organisation under Section 1</p> <ul style="list-style-type: none"> - (a) that body has a place of business or land in the Area of the County Council - (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; <p>or</p> <ul style="list-style-type: none"> - (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 has a beneficial interest exceeds one hundredth of the total issued share capital of that class. 		
Section 6	Gifts and Hospitality	Business Board Member	Spouse or Partner
6.1	Any gifts and/or hospitality received as a result of participation in Business Board (above the value of £25)		

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:

1. Any body to which I have been appointed or nominated by Suffolk County Council:

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

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:

Declaration

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.

Date	
[Participant's Name] (Capitals – in full)	
Signature	

Receipt by Suffolk County Council

Date received by Suffolk County Council	
Signature of Suffolk County Council Monitoring Officer	