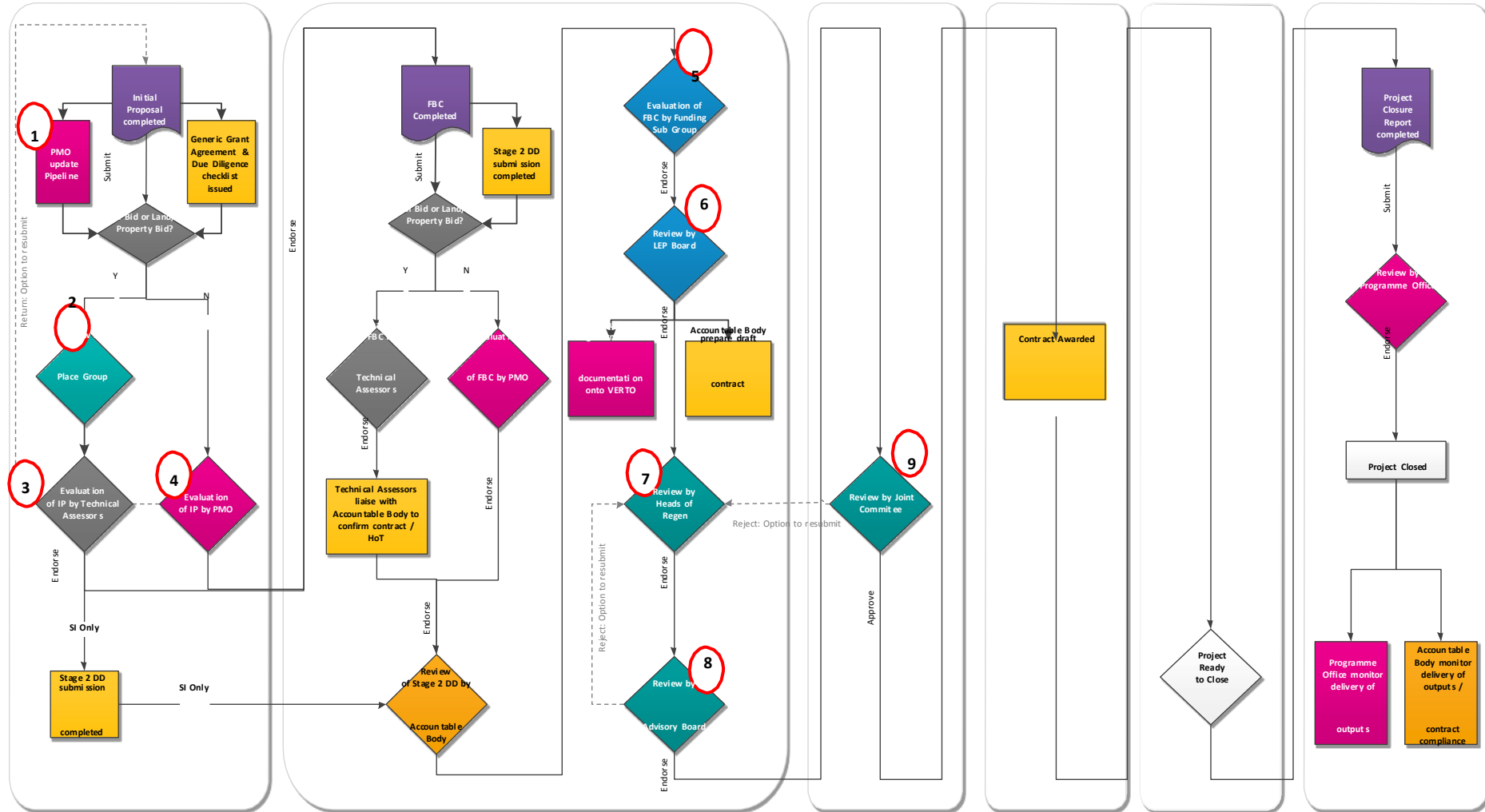


Managing Conflicts of Interest – at all stages of the project lifecycle



1) **Pipeline Entry:** Once an Initial Proposal is received the PMO will update the Black Country Pipeline which is then included within the set of monthly Dashboards; published to ensure transparency of all bids submitted. The sponsoring organisation and the senior responsible officer will be included.

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- 2) Place Group:** To avoid any conflict of interest, Place Group members are not involved in the appraisal process. However, a copy of the bid, when land / property, will be shared with the BC Officer Place Group who will review the bid for strategic fit only.
- 3) Appraisal:** Property / Land bids are subject to a detailed appraisal by independent professional property advisors
- 4) Appraisal:** Skills bids are subject to review by the Black Country Skills Director to test strategic fit. Transport bids are subject to an alternative appraisal in line with TfWM / DfT processes (*DfT for retained schemes*).
- 5) Funding Sub Group:** Full Business Cases's (FBC) along with accompanying appraisal documentation are considered in full by the Funding Sub Group (FSG). FSG members, or attending Local Authority Officer, will declare any form of interest with any applications for funding on the agenda at the beginning of the meeting. If an FSG member or attending Local Authority Officer has a pecuniary interest in a specific application they must leave the room when the bid is discussed and the vote cast. If an FSG member or attending Local Authority Officer has a non-pecuniary interest they are entitled to participate in discussions and votes, should they decide to do so.
- A register of interests is recorded and updated for each FSG meeting. LEP Board member interests are published on the LEP Website: <http://www.blackcountrylep.co.uk/about-us/our-board/>. The disclosure and nature of an interest is also recorded in the minutes of the FSG meeting.
- 6) LEP Board:** Projects that receive FSG endorsement are recommended for approval by the chair of the FSG to the LEP Board. LEP Board members will declare any form of interest with any applications for funding included within the FSG recommendation. If a member has a pecuniary interest in a specific application they must leave the room when the bid is discussed and the vote cast. If a member has a non-pecuniary interest they are not entitled to participate in discussions or votes, but may be allowed to remain in the meeting at the discretion of the chair. Following each LEP Board meeting an updated Register of interests is published on the LEP website. The disclosure and nature of an interest is also recorded in the minutes of the LEP Board meeting.
- 7) Working Group:** Currently there is no management for conflicts of interest within this group. It is recommended that a register of interests is maintained and updated for each meeting. As scheme sponsors, Working Group members should not be involved in the discussion regarding their own sponsored application for funding when there is a pecuniary interest. Members should declare any form of interest with any applications for funding on the agenda at the beginning of the meeting. At the point at which a sponsored application is to be considered, the sponsor should either:
- I. Present the report on the application for funding to the Working Group, and if the sponsor / Working Group member has a non-pecuniary interest they are entitled to participate in discussions and votes, should they decide to do so;
 - II. If the sponsor / Working Group member has a pecuniary interest, they must leave the room whilst the report on the application for funding is presented by a member of the PMO (on behalf of the LEP Board) to the Working Group, whilst a discussion takes place and the vote is cast.

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8) Advisory Board: Private sector LEP Board members will declare any form of interest with any applications for funding included within the LEP Board recommendation. If a LEP Board member has a pecuniary interest in a specific application they must leave the room when the bid is discussed and the vote cast. If a LEP Board member has a non-pecuniary interest they are entitled to participate in discussions and votes, should they decide to do so.

Elected Members rely on their Council statement of interests and for matters outside their respective council they rely on declarations made via the LEP Process. All these interests are published on the LEP website.

9) BC Joint Committee: Private sector LEP Board members will declare any form of interest with any applications for funding included within the LEP Board/ Advisory Board recommendation. If a LEP Board member has a pecuniary interest in a specific application they must to leave the room when the bid is discussed and the vote cast. If a LEP Board member has a non-pecuniary interest they are entitled to participate in discussions and votes, should they decide to do so. Elected Members rely on their Council statement of interests and for matters outside their respective council they rely on declarations made via the LEP Process. All these interests are published on the LEP website.

Pecuniary interest - shall include your personal financial interest or financial interests of:

- your spouse or civil partner’s
- a person you are living with as husband/ wife
- a person you are living with as if you were civil partners and you are aware that this other person has the interest

Non pecuniary interest – this is an interest which is not pecuniary (as defined) but is nonetheless so significant that a member of the public with knowledge of the relevant facts, would reasonably regard to be so significant that it would materially impact upon your judgement of the public interest,

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