



1. PURPOSE

This policy document has been created to address how the Cumbria Social Enterprise Partnership Steering Group (CSEP) will deal with conflicts of interest and conflicts of loyalty when they arise.

The purpose of having this policy is to provide clarity for individual CSEP SG members about the behaviour expected from them on such occasions; the CSEP SG as a whole, as to how it should address any declared or perceived conflicts should they arise; the Chair as to their role in the process and members for the purpose of providing information on the approach of the CSEP SG to this issue.

This policy will also apply to all subgroups of the CSEP SG whose memberships may include non-CSEP SG members.

In developing this policy it is acknowledged that conflicts of interest and conflicts of loyalty may arise from time to time for CSEP SG members and that this is normal.

2. PRINCIPLES

2.1 A conflict of interest arises when a CSEP SG member's private or business interests compete with his or her professional duties, in this case, membership of the Cumbria Social Enterprise Partnership.

2.2 A conflict of loyalty arises where a CSEP SG member is potentially influenced by considerations other than the best interests of the Cumbria Social Enterprise Partnership. Conflicts of loyalty may be sufficiently serious to amount to conflicts of interest.

2.3 Conflicts of interest and conflicts of loyalty will arise from time to time and that this is normal. When they arise, they are to be dealt with as outlined in this policy.

2.4 CSEP SG members have a duty to act independently in a personal capacity in promoting the aims of the Cumbria Social Enterprise Partnership in line with the governing documents.

2.5 Each CSEP SG member familiarise themselves with the definitions of conflicts of interest and loyalty as provided for here as well as the vision, aims, mission and values of the Cumbria Social Enterprise Partnership.

3. PROCEDURE

3.1 At the start of every CSEP SG meeting there will be an agenda item addressing potential conflicts of interest and loyalty with respect to items scheduled for discussion and decision at that meeting.

3.2 Each CSEP SG member, and anyone else present, must declare if they believe they may have a conflict of interest or a conflict of loyalty on a matter to be decided at the meeting in advance of any consideration.

3.3 The CSEP SG member or anyone else present, declaring such a conflict will refrain from influencing or seeking to influence a decision in relation to the matter and will take no part in any consideration of the matter.



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- 3.4 If the matter clearly amounts to a conflict of interest, the CSEP SG member or anyone else present, shall recuse him or herself, withdrawing from the meeting for so long as the matter is being discussed or considered by the CSEP SG sub-committee and will not vote or otherwise act as a CSEP SG member in relation to the matter.
 - 3.5 If the question as to whether the matter actually amounts to a conflict of interest is unclear, the CSEP SG will give some consideration to whether the matter raised amounts to a conflict of interest, having regard to the vision, mission and values of the Cumbria Social Enterprise Partnership.
 - 3.6 If there is no consensus on (3.5) above, the Chair will ultimately decide on an appropriate action for dealing with any concerns expressed, up to and including asking the relevant person to leave the room for the relevant discussion/decision.
 - 3.7 The CSEP SG member or those present concerned will subsequently be informed of the decision.
 - 3.8 The outcome of any matter raised as a potential conflict of loyalty or conflict of interest will be recorded in the minutes for that meeting. They will also be recorded in the 'Register of CSEP SG Members Interests' which is maintained by the Chair.
 - 3.9 The 'Register of CSEP SG Members and past CSEP SG Members' Interests' will be circulated to all.