

Local Skills Improvement Plan (LSIP) Conflicts of Interest Policy

Doncaster Chamber acting as lead Employer Representative Body (ERB) seeks to operate fairly, and transparently, and avoid conflicts of interest in relation to the South Yorkshire Local Skills Improvement Plan.

Purpose

The purpose of this policy is to protect the interests of Doncaster Chamber and its work as the designated Employer Representative Body for the Local Skills Improvement Plan (LSIP).

In the regular course of business, agents, Board members and Doncaster Chamber employees may have the opportunity to advance their own personal interests with or against the interests of the LSIP. Acting in such a manner is unacceptable and any party who acts outside of the company's and LSIP's best interest may be subject to disciplinary action.

We will seek to ensure that all relevant interests are disclosed and that all individuals working for or on behalf of the Doncaster Chamber of Commerce on the development of the LSIP for the South Yorkshire region comply with this policy and raise any matters of concern.

Scope

This policy applies to all individuals working for on behalf of Doncaster Chamber, whether permanent, fixed term or temporary, consultants, contracted suppliers and delivery partners, seconded staff, volunteers and agency staff or any other person performing services and duties for the Chamber on LSIP, whether paid or unpaid. These individuals are defined as Workers for the purposes of LSIP.

What is a conflict of interest?

A conflict of interest is any situation where Doncaster Chamber, as Designated Employer Representative Body, or one of our Workers, engages in any activity or obtains any financial, economic or other personal interest (directly or indirectly), which might (or might be perceived to) compromise their impartiality and independence in the context of performing the LSIP activity.

A conflict of interest can occur when an individual or organisation is put in a situation or circumstance that impacts their ability to apply judgement or act in their role in relation to the LSIP, or could be, impaired or influenced by a secondary interest. Even if the individual or organisation does not actually benefit, a conflict can still occur if it appears a decision may have been influenced. The perception of competing interests, impaired judgement or undue influence can also be a conflict of interest.



Record keeping

All parties listed as in scope are required to complete a Register of Interests form on at least an annual basis. This should be updated immediately as any changes arise. Any concerns or potential conflicts must also be raised as they arise. Doncaster Chamber will maintain a Register of Declared Interests detailing this information.

As the lead Designated Employer Representative Body, Doncaster Chamber will publish this policy and Register of Interests.

If there is a declared potential conflict of interest the relevant individual shall not be involved in any decision in respect of such matter. No contract will be made with or funding given to any person, organisation or Company in respect of which a material interest has been declared, without prior approval of the directors. A register of such conflicts will be maintained.

Addressing conflicts of interest

We will take all reasonable steps to avoid conflicts of interest while at the same time achieving the most effective engagement with and input into the South Yorkshire LSIP, taking advantage of the knowledge and expertise available.

Doncaster Chamber and its Board understand that by the very nature of the activity there will be conflicts of interest and so declaring these openly on the Register of Interests will enable them to be managed in a fair and transparent way.

We will not therefore necessarily exclude people or organisations from a discussion, depending on the nature of and outcomes sought from that discussion. We will monitor to ensure that no one uses their position inappropriately and will ensure that actions agreed do not give them an unfair advantage.

We will exclude individuals from discussion and decisions, for example, in awarding contracts to undertake work as part of the LSIP, and similarly in recruitment. At the start of procurement or equivalent we will check that no one involved has a conflict of interest in relation to potential bidders.

The role of the LSIP does not include commissioning provision so there will be no conflict of interest in that respect.

Responsibilities and raising concerns

The prevention, detection and reporting of actual, potential and perceived conflicts of interest is the responsibility of all those working on the LSIP. All Workers are required to avoid any activity that might lead to, or suggest, a breach of this policy. Workers must notify the Chamber's LSIP Sponsor, Emma Norton, enorton@doncaster-chamber.co.uk as soon as possible if it is believed or suspected that a conflict of interests exists, may exist, may be perceived to exist or may occur in the future.

All Workers are aware that they are responsible for the success of this policy and should ensure they use it to disclose any suspected danger of or actual wrongdoing.



If any Third Party is aware of any activity by any Worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with the Chamber's LSIP Sponsor, Emma Norton, enorton@doncaster-chamber.co.uk

As the Designated Employer Representative Body Doncaster Chamber must and will notify the Department for Education (the Department) of any perceived, potential and/or actual conflict of interest immediately we become aware of it, and immediately take all necessary steps to rectify the situation and notify the Department of the action taken. As the Designated Employer Representative Body we must also comply with any additional measures that the Department may require.

Sanctions

Any employee or contractor who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship in terms of the LSIP with non-employee Workers if they breach this policy. This includes non contractual relationships in terms of work on the LSIP.

If, as Designated Employer Representative Body, we are unable to reasonably satisfy the Department, in respect of a conflict of interest, the Department may remove the designation.

Communication

All Workers will be briefed on this policy, which will also be made available publicly on the LSIP area of the Doncaster Chamber website: <https://www.doncaster-chamber.co.uk/south-yorkshire-local-skills-improvement-plan-lsip-doncaster-chamber/>

Monitoring and review

Doncaster Chamber monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of issues arising from actual or potential conflicts of interest.