



Conflicts of Interest Policy

Policy statement

It is the policy of Cumbria Chamber of Commerce to maintain principles of openness, fairness and impartiality and to avoid conflicts of interest in relation to all activities.

Purpose

The purpose of this policy is to ensure that any actual or potential conflicts of interest are recorded and appropriately addressed.

We seek to ensure that all relevant interests are disclosed and that all individuals working for or on behalf of the Chamber comply with this policy and raise any matters of concern.

Scope and applicability

This policy applies to all individuals working for or on behalf of the Chamber whether permanent, fixed term or temporary, and wherever located, including consultants, associates, contractors, seconded staff, casual staff, agency staff, volunteers (including Board Members), agents, sponsors and any other person who performs services for or on behalf of the Chamber, (collectively referred to as Workers in this policy). In the context of the LSIP this also includes members of the Steering and ERB Groups and any organisations undertaking work on the LSIP, whether paid or unpaid. In the context of grant schemes it also includes grant panel members.

Specific conflict of interest policies may apply in addition to particular activities – for example for the Local Skills Improvement Plan.

This policy should be read and implemented in tandem with our Anti-Bribery and Corruption Policy.

What is conflict of interest

A conflict of interest is any situation where Cumbria Chamber, 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 Chamber 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 Chamber, or could be, impaired or influenced by a secondary interest. Even if the individual or organisation does not

V2 June 2026

Date of last review: N/A

Date of this review: June 2026

Approved by: Suzanne Caldwell

Date of next review: March 2027

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 Workers must declare any actual or potential conflicts of interests at the start of their engagement with us, when any changes occur and if asked to update at any time.

Conflicts of interest and declarations of them are specifically covered in our Contract of Employment and in our Adviser Contract.

A record of Conflicts of Interest 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 our activities, taking advantage of the knowledge and expertise available.

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.

Examples of how we address conflicts of interest:

- We exclude individuals from discussion and decisions, for example, in awarding contracts to undertake work 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.
- Declaration of conflicts of interest is a standing item at the start of each Board meeting.
- Grant panel members must declare any conflicts of interest in relation to applicants at each meeting where the application is to be discussed. This is recorded and they will take no part in discussion or decisions relating to that applicant.
- All Workers must flag conflicts whenever they arise on a meeting agenda.

Responsibilities and raising concerns

The prevention, detection and reporting of actual, potential and perceived conflicts of interest is the responsibility of all those working for the Chamber. All Workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Workers must notify the Managing Director, Suzanne Caldwell, suzanne@cumbriachamber.co.uk or relevant SMT activity lead, 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.

12 JUNE 2026

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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 Managing Director, Suzanne Caldwell, suzanne@cumbriachamber.co.uk.

Sanctions

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual or non-contractual relationship with non-employee Workers if they breach this policy.

Communication

All Workers will be briefed on this policy , which will also be made available publicly via our website.

Monitoring and review

The 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.