



Local Skills Improvement Plan (LSIP) 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 Cumbria's Local Skills Improvement Plan.

Purpose

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

We will seek to ensure that all relevant interests are disclosed and that all individuals working for or on behalf of the Chamber on LSIP 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, 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.

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, 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.

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Date of last review: February 2025

Date of this review: February 2026

Approved by: Suzanne Caldwell

Date of next review: March 2027

Record keeping

We will request all of those listed in Scope, above, to complete a Register of Interests form on at least an annual basis, and to update this immediately should anything change. They should also raise any concerns or potential issues as they arise.

These Registers of Interest will be retained by the Chamber. As the Designated Employer Representative Body we will publish and maintain this Conflict of Interest policy and a Register of Interests.

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 LSIP for Cumbria, taking advantage of the knowledge and expertise available.

The terms of reference for both the Steering Group and the ERB Group clearly articulate the position as follows:

“We recognise that, by the very nature of the activity and the Group, there will be conflicts of interest. Although the Group does not have any direct financial decision-making responsibilities, it does have a significant influence on the LSIP report, project activities and recommendations. It is therefore essential that any member who may have a pecuniary or non-pecuniary benefit from any discussions or decisions declares those at the outset (through a Conflict-of-Interest form) and again prior to any relevant discussion to enable potential conflicts to be recognised and managed appropriately.”

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 LSIP Project Manager, Suzanne Caldwell, suzanne@cumbriachamber.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.

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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 Managing Director/LSIP Project Manager, Suzanne Caldwell, suzanne@cumbriachamber.co.uk.

As the Designated Employer Representative Body the 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 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 via the LSIP area of our website, <https://www.cumbriachamber.co.uk/local-skills-improvement-plan-lsip>.

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.