

Conflict of Interest Policy

All staff, volunteers, and Local Action Group (LAG) members of the Loddon and Test LEADER Programme will strive to avoid any conflict of interest between the interests of the Organization (Loddon and Test LEADER Programme) on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

The purposes of this policy is to protect the integrity of the Organization's decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of volunteers, staff and committee members.

Examples of conflicts of interest include:

- 1 A staff or LAG member who is also an applicant who must decide on what grant intervention measures should be adopted.
- 2 A staff or LAG member who is connected or related to an applicant or member of staff employed by them, and there is a decision to be taken on whether or not that applicant is eligible to apply to LEADER and/or decisions once the application has been submitted.
- 3 A staff or LAG member who is also on the committee of another organisation that is competing for the same funding.
- 4 A staff or LAG member who has shares in/or owns a business that may be awarded a contract to do work or provide services for a grant recipient as part of their LEADER funded project/s.
- 5 A staff or LAG member who will benefit financially from knowledge or recommendations made to them via their contacts in the LAG.

Upon appointment each staff and LAG member will make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated as appropriate.

In the course of activities (this would include all aspects of the programme's operation), meetings, or Decision Making Panels, staff and/or LAG members will disclose any interests in a transaction or decision where there may be a conflict between the organisations best interests and the LAG members best interests or a conflict between the best interests of two organisations that the LAG member is involved with. If a member of staff undertaking their normal duties as part of the LEADER Programme should suspect a conflict of interest, they must declare this and the conflict of interest should be adjudicated by either a senior member of staff in the Accountable Body (Hampshire County Council) or by the ruling of the Chair at LAG meetings. If the Chair has a conflict of interest, this will be determined by the Vice Chair. All conflicts of interest at LAG meetings will be declared in the minutes. If a member of staff has a potential conflict of interest, this will be recorded in the project file including any decisions made, as well as on DORA (the RPA database).

Should a situation arise whereby the Accountable Body (HCC) feels that the LAG chair has a potential conflict of interest but yet a disagreement ensues, the

Accountable body would have the right to overrule a decision by the LAG or Chair in order to maintain compliance of the LEADER Programme. This may also be for example in an event whereby there was misunderstanding over the programme rules, or where the LAG Chair was unable to attend and the knowledge required was not present at the LAG meeting in question.

Prior to project application appraisals, any person undertaking the appraisal must also declare whether or not a conflict of interest is present and this should be recorded on the file and any actions taken as a result, such as a different person selected to appraise at this time.

Options to select at time of meeting:

*Option 1: After disclosure, I understand that I may be asked to leave the room for the discussion and may not be able to take part in the decision depending on the judgement of the other committee members present at the time.

*Option 2: After disclosure, I understand that I will be asked to leave the room for the discussion and will not be able to take part in the decision.

*Option 3: After disclosure, I understand that I may remain in the room, but take no further part in the discussion.

*Option 4: After disclosure, I understand that I may remain in the room but contribute only factual information and clarifications.

*Option 5: After disclosure, I understand that I may remain in the room but not take part in any decisions and therefore not be counted towards a quorum

*Option 6: After disclosure, I can remain as a full member of the meeting.

Any such disclosure and the subsequent actions taken will be noted in the minutes.

This policy is meant to supplement good judgment, and staff, volunteers and management committee members should respect its spirit as well as its wording. It notes that potential conflicts of interest may be real or perceived, and may specify varying degrees of severity of a potential conflict.

Alongside this document sits a more detailed code of conduct relating to potential Conflicts of interest.

All potential conflicts of interest will be recorded, either on project files, in meeting minutes, within the Register of Interests and on DORA.

Date Adopted: _____

* chose which option you prefer.