

WEST MIDLANDS COMBINED AUTHORITY.

CONFLICT OF INTEREST POLICY FOR NON-ELECTED PARTICIPANTS IN COMBINED AUTHORITY GOVERNANCE.

This Conflict of Interest Policy applies to individuals who have been appointed to participatory roles within the governance structures of the West Midlands Combined Authority (WMCA) As a Participant in the WMCA governance structures you will bear in mind at all times the need to maintain public confidence in the transparency and objectivity of the decision-making process of the WMCA and to this end you will avoid situations where it may be considered that your decision-making ability may be affected by a conflict of interest, however that arises. You shall have regard to the following seven principles of public life – selflessness, integrity, objectivity, accountability, openness, honesty and leadership which will inform your conduct in relation to all activities undertaken on behalf of the WMCA. This Policy will apply at all times when you might reasonably be perceived to be acting on behalf of or representing the WMCA but not otherwise.

Accordingly, when acting in your capacity as a Participant in WMCA:

- You must act in a manner consistent with WMCA's equality and diversity strategy and treat your fellow Participants, Members, Officers and others, including the public, who you come into contact with when working in your role, with respect and courtesy at all times.
- You must act solely in the public interest and should not take part in discussions or decisions where you have a financial interest or other conflict of interest or where such a circumstance applies to your immediate family, a friend or close associate.
- You must not place yourself under a financial or other obligation to outside individuals or organisations that might be reasonably considered as an influence upon you in the performance of your duties to the WMCA.
- When participating in WMCA activities you must make all choices, such as appointments, awarding contracts, and allocating funding, based on evidence and having due regard to any professional advice given by Officers or others.
- You are accountable for your decisions and you must co-operate fully with whatever scrutiny is appropriate to your position.
- You must declare and register any private interests, both financial and non-financial, including membership of any body, organisation or political party that relates to your participation in WMCA activities.
- Where you have an interest in any item of business at a relevant meeting of the WMCA you must declare that interest and withdraw from the meeting, taking no further part in the discussion or any vote. All such declarations and the reasons for them will be recorded in the minutes.
- You must, when using or authorising the use by others of the resources of WMCA, ensure that such resources are not used improperly for party political or personal purposes.
- You must promote and support high standards of conduct when acting as a Participant, in particular as characterised by the above requirements, by your leadership and by example.

Registering and declaring pecuniary and non-pecuniary interests

You must, prior to acting as a Participant, notify the WMCA Monitoring Officer of any financial interest, where that interest is yours, your spouse's or civil partner's, or somebody with whom you are living with as a spouse, or as if you were civil partners.

In addition, you must, prior to acting as a Participant, notify the WMCA Monitoring Officer of any non-financial interest which WMCA has decided should be included in the register or which you consider should be included if you are to fulfil your duty to act in conformity with the Seven Principles of Public Life.

Participants must register within 28 days of receipt any gifts or hospitality which have been offered in connection with their participation in WMCA.

Participants should review their individual register of interest on a regular basis and update the information as appropriate so that it remains accurate.

Unless dispensation has been granted, you may not participate in any discussion of, vote on, or discharge any function related to any matter in which you have a financial interest.

For the purposes of this policy, the definitions of financial (pecuniary) interests are as those set out in the Localism Act 2011 and The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012.

Dispensations

The grounds upon which WMCA may grant a dispensation relieving a Participant from restrictions on participating or in a matter in which they have a disclosable interest are set out below. A Participant may make an application to the Monitoring Officer to be relieved of the restriction on participation.

The circumstances in which dispensation may be granted are:

- That so many Participants, Members and/or Officers have disclosable pecuniary interests in a matter that it would impede the transaction of business.
- That the dispensation is in the interests of persons living in the Area of the combined Authority.
- That it is otherwise appropriate to grant a dispensation

Any dispensations granted must be formally recorded.

WMCA: Register of [Participants'] Interests

June 2018 to June 2019

As a Participant in the [business activities] [meetings] decision making] of WMCA, I declare that I have the following disclosable pecuniary and/or non-pecuniary interests. (Please state 'None' where appropriate, do not leave any boxes blank).

SECTION 1	ANY EMPLOYMENT, OFFICE, TRADE, PROFESSION OR VOCATION CARRIED ON FOR PROFIT OR GAIN	MYSELF	SPOUSE/PARTNER*
1.1	Name of: - your employer(s) - any business carried on by you - any other role in which you receive remuneration (this includes remunerated roles such as councillors)		
1.2	Description of employment or business activity		
1.3	The name of any firm in which you are a partner.		
1.4	The name of any company for which you are a remunerated director		
SECTION 2	SPONSORSHIP	MYSELF	SPOUSE/PARTNER
	Any financial benefit obtained (other than from WMCA) which is paid as a result of carrying out duties as a [Participant]. This includes any payment or financial benefit from a Trade Union within the meaning of the		

	Trade Union and Labour Relations (Consolidation) Act 1992		
SECTION 3	CONTRACTS	MYSELF	SPOUSE/PARTNER
3.1	Any contract for goods, works or services with WMCA which has not been fully discharged by any organisation named at 1.1.		
3.2	Any contract for goods, works or services entered into by any organisation named at 1.1 where either party is likely to have a commercial interest in the outcome of the business being decided by WMCA in the forthcoming meeting.		
SECTION 4	LAND OR PROPERTY	MYSELF	SPOUSE/PARTNER
	<p>Any beneficial interest you or any organisation listed at 1.1 may have in land or property which is likely to be affected by a decision made by WMCA in the forthcoming meeting.</p> <p>This would include, within the Area of the Combined Authority [and/or Non-Constituent Councils] :</p> <ul style="list-style-type: none"> • Any beneficial interest in any land in the Area of the Combined Authority (and/or Non-Constituent Councils), including your place(s) of residency • Any tenancy where the landlord is the WMCA and the tenant is a body in which relevant person has a beneficial interest 		

	<ul style="list-style-type: none"> Any licence for a month or longer to occupy land owned by WMCA <p>For property interests, please state the first part of the postcode and the local authority where the property resides. If you own/lease more than one property in a single postcode area, please state this.</p>		
SECTION 5	SECURITIES	MYSELF	SPOUSE/PARTNER
	<p>Any beneficial interest in securities of an organisation under 1.1 where:-</p> <p>(a) that body (to my knowledge) has a place of business or land in the Area of the combined authority (and/or Non-Constituent Councils]; and</p> <p>(b) either –</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p>		

SECTION 6	GIFTS AND HOSPITALITY	MYSELF	SPOUSE/PARTNER
	Any gifts and/or hospitality received as a result of participation in WMCA (above the value of £25)		

OTHER INTERESTS

Membership of Organisations

I am a member of, or I am in a position of general control, a trustee of, or participate in the management of:

1. Any body to which I have been appointed or nominated by WMCA:

2. Any body exercising functions of a public nature (eg school governing body or another Combined Authority):

3. Any body directed to charitable purposes:

4. Any body, one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union):

5. Any local authority (please state any interests you hold as LA leaders/cabinet members for LA land, resources and the LA's commercial interests):

6. Any other interest which I hold which might reasonably be likely to be perceived as affecting my conduct or influencing my actions in relation to my role.

[PARTICIPANT’S] DECLARATION AND SIGNATURE

I confirm that having carried out reasonable investigation, the information given above is a true and accurate record of my relevant interests, given in good faith and to the best of my knowledge;

Date	
[Participant’s Name] (Capitals – in full)	
Signature	

RECEIPT BY WMCA

Date received by WMCA	
Signature of WMCA Monitoring Officer	