

Conflict of Interest Policy

Northamptonshire Chamber of Commerce

As designated lead on the Learning and Skills Improvement Plan (LSIP), Northamptonshire Chamber of Commerce have been asked by the Department of Education to establish a project Conflict of Interest policy. This policy will be reviewed annually – next review date November 2023.

I. Purpose

The purpose of this policy is to protect the interests of Northamptonshire Chamber of Commerce and its work as the designated Employer Representative Body for the Local Skills Improvement Plan in the SEMLEP area. In the regular course of business, agents and employees of Northamptonshire Chamber of Commerce may have the opportunity to advance their own personal interests with or against the interests of Northamptonshire Chamber of Commerce. Acting in such a manner is unacceptable and any party who acts outside of Northamptonshire Chamber of Commerce's best interest may be removed from participation in the LSIP Project.

II. Definitions

- a. Employee – any person who is employed by Northamptonshire Chamber of Commerce as part of the LSIP programme in a part or full-time capacity and in accordance with the employment laws of the United Kingdom.
- b. Agent – an owner, director, stakeholder, contractor or other third-party that is in the position to act on behalf of Northamptonshire Chamber of Commerce as part of the LSIP programme.
- c. Financial Interest – The interest that any individual may have in the monetary transactions of Northamptonshire Chamber of Commerce as part of the LSIP programme . In particular, any interest that could have a direct bearing on the financial gain/loss of said individual.

III. Procedure

a. Duty to disclose

Every employee/agent of Northamptonshire Chamber of Commerce as part of the LSIP programme is obligated to disclose any known or potential conflicts of interest as soon as they arise and bring them to the attention of the Executive Committee for discussion.

b. Investigating potential conflicts

When a possible conflict of interest arises, the executive committee will collect the pertinent information and may question any concerned parties. If the committee determines that a conflict exists, steps will be taken to

address the conflict. If no conflict exists, the inquiry may be documented but no further action will be taken.

c. **Addressing conflicts of interest**

When an actual conflict of interest is found, any transactions that may have been affected will be reviewed retroactively. Affected parties both within and outside of the business, including shareholders, directors, employees, and contractors will be notified. An investigation will also be conducted by the executive committee to determine the extent of the conflict and the intentions of the parties involved.

If the conflict in question involves a member or members of the committee, such a member will be excused from the deliberations.

Should any conflicts not be resolved by the LSIP Executive Committee then the Northamptonshire Chamber of Commerce Board shall be deemed to be the final arbiters and decision makers.

IV. Acknowledgement

The employee/agent named below understands the procedure for conflicts of interest with Northamptonshire Chamber of Commerce as part of the LSIP programme , including their duty to disclose any known or potential conflicts.

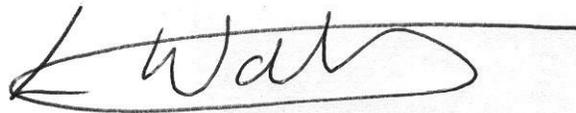
Furthermore, the employee/agent agrees to abide by the procedures outlined in this policy for the duration of their professional relationship with Northamptonshire Chamber of Commerce.

Louise Wall

30/10/2022

Employee Name

Date



Signature