

Surrey Local Skills Improvement Plan (LSIP)

Conflict of Interest Policy

1. Purpose

This policy ensures that all individuals involved in the governance, development, delivery, or review of the Surrey Local Skills Improvement Plan (LSIP) act with integrity, impartiality, and transparency. It safeguards the LSIP process from undue influence and maintains public confidence in the employer-led model required under the Skills and Post-16 Education Act 2022.

2. Scope

This policy applies to all members of:

- The **LSIP Steering Board**
- The **LSIP Working Group**
- **Sector Advisory Panels**
- Any individual or organisation contributing to LSIP evidence, decision-making, or recommendations

This includes representatives from the Employer Representative Body (ERB), Surrey County Council (Strategic Authority), FE and HE providers, employers, sector bodies, Jobcentre Plus, and other stakeholders.

3. Definition of a Conflict of Interest

A conflict of interest arises when an individual's personal, professional, financial, or organisational interests could improperly influence — or be perceived to influence — their judgement, decisions, or actions relating to the LSIP.

Conflicts may be:

- **Actual** – a direct conflict exists
- **Potential** – a conflict may arise in future
- **Perceived** – a reasonable person might believe a conflict exists

Examples include:

- Financial interests in training provision or procurement
- Organisational interests that could benefit from LSIP recommendations
- Personal relationships influencing decisions
- Competing roles across multiple governance bodies
- Advocacy for provision changes that directly benefit one's own institution

4. Principles

All LSIP partners must adhere to the following principles:

- **Transparency** – openly declare interests
- **Impartiality** – act in the collective interest of Surrey’s skills system
- **Accountability** – accept scrutiny and oversight
- **Integrity** – avoid actions that could compromise trust
- **Proportionality** – manage conflicts appropriately, not punitively

5. Declaration of Interests

All governance members must:

1. Complete a **Declaration of Interests Form** upon appointment
2. Update their declaration annually
3. Immediately report any new or emerging conflicts

A **Register of Interests** will be maintained by the ERB and published as part of LSIP governance transparency.

6. Managing Conflicts of Interest

When a conflict is declared, the Chair (or Co-Chair) will determine the appropriate action. Options include:

- **No action** – if the conflict is minimal or irrelevant
- **Partial exclusion** – member may participate in discussion but not decision-making
- **Full exclusion** – member withdraws from both discussion and decision-making
- **Delegation** – responsibility transferred to an impartial member
- **Additional transparency measures** – e.g., recording rationale in minutes

All decisions must be recorded in the meeting minutes.

7. Undeclared Conflicts

If a conflict is discovered that has not been declared:

- The Chair will investigate
- The individual may be temporarily suspended from LSIP governance
- Actions taken will be recorded and reported to the Steering Board
- Repeated non-disclosure may result in removal from the governance structure

8. Responsibilities

ERB (Statutory Lead):

- Maintain the Register of Interests
- Ensure compliance with designation conditions
- Provide impartial oversight

Strategic Authority (Surrey County Council):

- Support transparent decision-making
- Ensure alignment with local economic priorities without undue influence

All Members:

- Declare interests promptly
- Act in the collective interest of Surrey's skills system
- Uphold the integrity of the LSIP process

9. Review of the Policy

This policy will be reviewed:

- Annually
- When governance structures change
- When statutory guidance is updated

Updates will be approved by the LSIP Steering Board and published in Annex C of the LSIP.