

AGENDA

Marches Enterprise Joint Committee

Date: **Wednesday 21 February 2018**

Time: **10.00 am**

Place: **Plowden Room, Craven Arms Community Centre,
Newington Way, Craven Arms SY7 9PS**

Notes: Please note the time, date and venue of the meeting.

For any further information please contact:

Sarah Smith

Tel: 01432 260176

Email: sarah.smith1@herefordshire.gov.uk

If you would like help to understand this document, or would like it in another format, please call Sarah Smith on 01432 260176 or e-mail sarah.smith1@herefordshire.gov.uk in advance of the meeting.

Agenda for the Meeting of the Marches Enterprise Joint Committee

Members:

Chairman	Councillor AW Johnson	Herefordshire Council
	Councillor S Davies	Telford and Wrekin Council
	Councillor PA Nutting	Shropshire Council
Non Voting Member	Mr G Wynn OBE	Chairman of the Local Enterprise Partnership

AGENDA

	Pages
1. APOLOGIES FOR ABSENCE AND NAMED SUBSTITUTES (IF ANY) To receive apologies for absence and to receive details of any Executive Member nominated to attend the meeting in place of the voting Member representing their Authority .	
2. DECLARATIONS OF INTEREST To receive any declarations of interest by members of the Committee in respect of items on the agenda.	
3. MINUTES To approve and sign the Minutes of the meeting held on 13 December 2017.	5 - 6
4. LEP GOVERNANCE AND TRANSPARENCY PAPER To approve adopting the national 'Register of Interests' template, 'Confidential Reporting' procedure and 'Whistleblowing' policy all based on examples set out within HM Governments 'Best Practice Guidance' paper (January 2018).	7 - 30

MINUTES of the meeting of Marches Enterprise Joint Committee held at Plowden Room, Craven Arms Community Centre, Newington Way, Craven Arms SY7 9PS on Wednesday 13 December 2017 at 2.45 pm

Present:

Councillors: PA Nutting and JG Lester

Officers: Nicholas Alamanos and Valerie Hastie

In the absence of the standing chairman Councillor Lester took the chair for this meeting.

13. APOLOGIES FOR ABSENCE

Apologies were received from Councillors Johnson and Davies and from Mr Wynn.

Apologies were also noted from the LEP Director.

14. NAMED SUBSTITUTES (IF ANY)

Councillor JG Lester substituting for Councillor AW Johnson.

15. DECLARATIONS OF INTEREST

None.

16. MINUTES

Resolved that:

the minutes of the meeting held on 18 July 2017 be confirmed as a correct record and signed by the Chairman.

17. THE MARCHES AND MID WALES DRAFT FREIGHT STRATEGY

The draft freight strategy was discussed. Councillor Lester noted the importance of having such as strategy.

Councillor Nutting stated that it was important this strategy aligned with others such as Midlands Connect and the strategies of the combined west midlands authorities.

The project development officer stated that wide ranging consultation had taken place during the creation of the strategy to ensure alignment with other strategies and policies.

This included consultation with the freight industry, parish and town councils, Midlands Connect, Highways England and Network Rail among others.

Resolved that:

- (a) Joint Committee members endorse the Marches and Mid Wales Freight Strategy.**

18. DRAFT MARCHES LEP CODE OF CONDUCT

The draft Marches LEP code of conduct and conflicts of interest policy were discussed.

The programme manager explained that the LEP board had undertaken a workshop in March 2017, facilitated by the centre for public scrutiny, to develop a more robust code of conduct and conflicts of interest policy. This work had pre-empted to a degree some of the recommendations in the review of LEP governance and transparency carried out by Mary Ney for the DCLG.

The monitoring officers of the three partner authorities had worked on the draft code and policy. The draft was approved by the LEP board at its meeting on 19 September 2017.

Resolved that:

- (a) The MEJC approves the LEP Code of Conduct and Conflicts of Interest Policy and this document be attached as an Annex to the LEP Accountability and Assurance Framework and be added as a download on the LEP website.**

19. MEETING DATES FOR 2018

Arrangements for joint committee meetings in 2018 were discussed. Provisional dates to be circulated, taking account of existing commitments wherever possible.

The meeting ended at 2.55 pm

CHAIRMAN



Marches Enterprise Joint Committee	
Meeting date:	21 February 2018
Title of report:	Local Enterprise Partnership (LEP) Governance
Report by:	Marches LEP Programme Manager

Classification

Open

Decision type

This is not a key decision.

Purpose and summary

The Marches Enterprise Joint Committee approve adopting the national 'Register of Interests' template, 'Confidential Reporting' procedure and 'Whistleblowing' policy all based on examples set out within HM Governments 'Best Practice Guidance' paper (January 2018). Whilst noting the current position relating to the implementation of the existing 'Code of Conduct' policy and publication of LEP Board meeting and agenda items.

The adoption and implementation of the outlined recommendations forms part of a wider Government review on strengthening Local Enterprise Partnerships role in driving economic growth, ensuring a minimum standard of robust corporate governance is met.

The documents are required to be adopted and uploaded onto the Marches Local Enterprise Partnerships website by 28 February 2018.

Recommendation(s)

THAT:

- (a) the 'Confidential Reporting Procedure' at appendix 1 and 'Whistleblowing Policy' at appendix 2 be adopted with immediate effect;**
- (b) the national template for 'Registers of Interest' at appendix 3 be adopted for implementation with immediate effect;**
- (c) the existing Marches LEP Code of Conduct be amended to reflect its application to LEP staff; and**
- (d) authority be delegated to the LEP director in consultation with the LEP Board to implement, if required, the publication of LEP Board agendas, meeting papers and decisions.**

Alternative Options

1. It is open to the committee to adopt alternative policies and procedures to the templates provided. In doing so regard must be had to ensuring compliance with the requirements of the Government's assurance framework and guidance for LEPs.
2. The requirements of the guidance regarding publication of boards making decisions about public money could be applied to the Marches LEP Board in the interests of transparency.

Key considerations

3. In October 2017, the then Department for Communities and Local Government (DCLG) published a Review of Local Enterprise Partnerships Governance and Transparency led by Mary Ney, Non-Executive Director of the DCLG Board. The purpose of the review was to gain assurance that LEP's were fully implementing existing requirements for appropriate governance and transparency, and to make recommendations to secure improvement.
4. Following publication of the review the Government accepted all recommendations and subsequently published ["Local Enterprise Partnership governance and transparency: Best practice guidance"](#) (Live link). This guidance provides a mixture of good practice examples which LEP's may adopt, and some specific standards and guidance which LEP's must follow. Compliance with the required standards and guidance will be monitored by Area Leads from the Cities and Local Growth Unit.
5. The guidance relates to policies and procedures covering the following areas:
 1. Publication of meeting and agenda items.
 2. Confidential reporting procedures for third parties and the public.
 3. Whistleblowing Policy
 4. Code of Conduct.
 5. Registers of interests.
6. All the required policies and procedures should be in place by 28 February 2018 - ensuring all documents are uploaded and 'easily accessible' within the Marches LEP website.
7. The Marches LEP has not previously adopted either a Whistleblowing or Confidential Reporting Policy. The LEP maintains a register of interests and its Code of Conduct was revised in December 2017; the code currently applies to board members, co-optees and advisors.
8. The LEP team, in consultation with the partner councils' monitoring officers, have reviewed the guidance and to ensure full compliance recommend that:
 - the 'Confidential Reporting Procedure' and 'Whistleblowing Policy' provided in the guidance and as at appendices 1 and 2 be adopted;
 - the national Register of Interests template as set out in appendix 3 be adopted to replace the existing register of interests with effect from 1 March 2018.
 - The existing Marches LEP Code of Code be maintained but its applicability be amended to extend to all LEP employees as well as board and committee members, co-optees and advisors. This ensures that the existing requirements of

Further information on the subject of this report is available from
Nicholas Alamanos, Marches LEP Programme Manager, 01743 462026

nicholas.alamanos@marcheslep.org.uk,

the accountability framework are met. All existing and new staff, advisors and board members will be asked to provide written confirmation that they will uphold the code.

9. The guidance requires LEPs to publish relevant information (i.e. meeting agendas, minutes and declarations of interest) in line with the statutory requirements applicable to councils where decisions are being made involving public money. Currently all decisions are taken either by the Marches Enterprise Joint Committee, or under delegation from the committee to the Director. These decisions are informed by the views and recommendations of the board and its committees. The Marches Enterprise Joint Committee fully complies with the publication requirements in the guidance. Decisions taken by the director under delegation are similarly required to follow the publication requirements.
10. Whilst not a formal decision-making body, the minutes of LEP board meetings are published in the interests of transparency.
11. In light of the arrangements that are in place, confirmation has been sought from the Ministry for Housing, Communities and Local Government that the requirements of the guidance have been met. It is therefore not currently recommended that any changes to these arrangements are necessary. However, in case changes are required a delegation is provided to the Director to implement the guidance if required.

Community impact

12. Corporate governance is the term used to describe the systems, processes, culture and values an organisation adopts to help it achieve its aims effectively and in a timely, open, and accountable way. Good corporate governance encourages better informed longer-term decision making using resources efficiently, and being open to scrutiny with a view to improving performance and managing risk. The recommendations ensure that policies and procedures are in place to support this aim.

Equality duty

13. Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to –
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Resource implications

14. These are unknown, should the Government decide that LEP Board meeting and agenda papers should be published in accordance with Local Government Act 1972, then additional resources may be required to support this process.

Legal implications

15. Implementing these recommendations ensures that the Marches LEP complies with the HM Government, LE Governance & Transparency, Best Practice Guidance, January 2018.

Risk management

16. All LEPs are required to ensure they have robust corporate governance policies and procedures in place. These standards will be monitored by Government Officials ensuring compliance as part of a wider review on LEP performance. None compliance will pose a significant risk and have negative impact on the LEP and any grant it receives.

Consultation

17. The Marches LEP Board considered the proposals at its meeting of 30 January 2018 and supported the recommendations set out in this report.

Appendices

Appendix 1 – Confidential Reporting Procedure

Appendix 2 – Whistleblowing Policy

Appendix 3 – Register of Interests template

Background papers

None identified



Marches LEP - Confidential Reporting of Complaints

1. The LEP is committed to creating a work environment with the highest possible standards of openness, probity and accountability. In view of this commitment we encourage employees and others with serious concerns about any aspect of the LEP's work to come forward and voice those concerns without fear of reprisal. For employees and those working closely with the LEP, please follow the whistleblowing policy on our website [*Insert hyperlink to whistleblowing procedure*]. For third parties and members of the public, please follow the confidential complaints procedure outlined below.
2. However, if a member of the public or third party believes that their complaint fits the description below; they can elect to report their concerns through the whistleblowing policy procedure [*Insert hyperlink to whistleblowing procedure*].
3. *Whistleblowing* - where an individual who has concerns about a danger, risk, contravention of rules or illegality provides useful information to address this. In doing so they are acting in the wider public interest, usually because it threatens others or impacts on public funds. By contrast, a grievance or private complaint is a dispute about the individual's own position and has no or very limited public interest.

Confidentiality

4. If a member of the public or a third party wants to make a confidential complaint or raise a concern, it will be treated in confidence and every effort will be made to protect the person's identity if they wish to remain anonymous. The LEP will investigate all complaints or allegations.

Anonymous allegations

5. The LEP takes all complaints and concerns raised by members of the public and third parties seriously. We will investigate anonymous allegations. However, we remind complainants that when people put their names to an allegation the ability to investigate and therefore reach firm conclusions is strengthened. Concerns expressed anonymously will be considered at the discretion of the LEP. When exercising this discretion, the factors to be taken into account would include:
 - the seriousness of the issue raised;
 - the credibility of the concern; and
 - the likelihood of confirming the allegation from attributable sources.
6. The Ministry of Housing, Communities and Local Government may request information arising from this process if they have concerns regarding a LEP or have been approached with similar complaints. The expectation is that this information will be provided on an anonymous basis. However it may be necessary to provide personal details to progress a complaint.

7. Where details are gathered, the LEP will put in place appropriate data protection arrangements in line with the [Data Protection Act 1998](#).

Confidential Complaints Procedure

8. The LEP is aware that the organisation's ordinary complaints procedure may not be suitable if someone wants the complaint to remain confidential. If you would like to make a confidential complaint please write or email to:

Gill Hamer, Marches LEP Director, Cameron House, Knights Court, Archers Way, Battlefield Enterprise park, Shrewsbury, SY1 3GA, or Nicholas Alamanos, Marches LEP Programme Manager, Cameron House, Knights Court, Archers Way, Battlefield Enterprise park, Shrewsbury, SY1 3GA.

State that you want the complaint to remain confidential.

Action taken by the LEP

9. The designated complaints officer will raise your concern and investigate the complaint. You can expect the officer to:
- Contact you within 10 clear working days to acknowledge the complaint and discuss the appropriate course of action.
 - Write to you within 28 clear working days with findings of the investigation. If the investigation has not concluded within 28 clear working days, the officer will write to you to give reasons for the delay in resolving the complaint.
 - Take the necessary steps to rectify the issue.

If you are unhappy with the outcome of the complaint or the complaint involves those responsible for the confidential complaints procedure:

- You can escalate your concerns through other organisations mentioned in the normal complaints procedure e.g. the LEP's Accountable Body which is Shropshire Council. These organisations will have their own confidentiality procedures.
- If you are either unable to raise the matter with the LEP or you are dissatisfied with the action taken you can report it direct to the Cities and Local Growth Unit in the Ministry of Housing, Communities and Local Government and the Department for Business, Energy and Industrial Strategy, at the following email address: LEPPolicy@communities.gsi.gov.uk or by writing to: LEP Policy Deputy Director, Cities and Local Growth Unit, Fry Block, 2 Marsham Street, London, SW1P 4DF. You should clearly mark your email or letter as "Official - complaints".



Marches LEP - Whistleblowing Policy

Introduction

1. A Discloser is the person who is the whistle-blower.
2. This procedure outlines the process to follow for a Discloser when reporting a perceived wrongdoing within the LEP, including something they believe goes against the core values of Standards in Public Life (the Nolan Principles) and the Code of Conduct (Chapter 4) for LEP Board Members and staff. The Standards in Public Life include the principles of; integrity, objectivity, accountability, openness, honesty, leadership and impartiality.
3. In particular LEP Board Members, as the key decision makers of the LEP, have a right and a responsibility to speak up and report behaviour that contravenes these values.
4. It is important that this procedure is followed when raising any concerns, to ensure that the matter is dealt with correctly

Definitions

5. This document uses the following definitions:
 - *Whistleblowing* - where an individual who has concerns about a danger, risk, contravention of rules or illegality provides useful information to address this. In doing so they are acting in the wider public interest, usually because it threatens others or impacts on public funds. By contrast, a grievance or private complaint is a dispute about the individual's own position and has no or very limited public interest.

The LEP – The Marches Local Enterprise Partnership

- *Discloser* – this is the person who is the whistle-blower. They might be an employee, a LEP Board Member, a contractor, a third party or a member of the public.
- *Responsible Officer* - this is the person, appointed by the LEP, with overall responsibility for maintaining and operating this whistleblowing policy. They will maintain a record of concerns raised and the outcomes (but will do so in a form that does not endanger confidentiality) and will report to senior decision makers as necessary. Their name is Nicholas Alamanos and their contact details are nicholas.alamanos@marcheslep.org.uk, 07458 124655, Cameron House, Knights Court, Archers Way, Battlefield Enterprise Park, Shrewsbury, SY1 3GA. If the concern relates to the Responsible Officer then the concern should be raised with Gill Hamer, gill.hamer@marcheslep.org.uk, 07990 086392 Cameron

House, Knights Court, Archers Way, Battlefield Enterprise Park, Shrewsbury, SY1 3GA.

- *Relevant Concern* – something the Discloser has been asked to do, or is aware of, which they consider to be wrong-doing and is in the public interest.

Scope

6. The LEP is committed to creating a work environment with the highest possible standards of openness, probity and accountability. In view of this commitment, we encourage Disclosers with serious concerns about the work of the LEP to come forward and voice their concerns without fear of reprisal.
7. Disclosers should note that where the concern is one that might fall under the LEP's staff or work force policies on equality and diversity or harassment and bullying or other staff policies, they should consider using the reporting mechanisms for those other policies first <https://www.marcheslep.org.uk/>
8. The LEP has a pre-existing complaints procedure that in many cases will be more appropriate for third parties or members of the public to follow. Third parties or members of the public should review the separate confidential complaints procedure outlined in the LEP's complaints policy <https://www.marcheslep.org.uk/> on the LEP's website first before going through the whistleblowing process.
9. However, if a member of the public or third party believes that their complaint fits the description of a 'relevant concern' outlined below, they may report their concerns through the whistleblowing policy procedure.

Policy Statement

10. The LEP acknowledges that Disclosers may often be the first people to realise that there may be something seriously wrong within the organisation.
11. This policy aims to:
 - Encourage people to feel confident about raising serious concerns and to question and act upon their concerns without fear of victimisation or harassment;
 - Provide avenues for Disclosers to raise those concerns and receive feedback on any action taken;
 - Allow Disclosers to take the matter further if they are dissatisfied with the LEP's response; and
 - Reassure all Disclosers, employees in particular who may have specific concerns about their position and employment status in the LEP, that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made any disclosure in the public interest.

What is a relevant concern?

12. If a Discloser is asked to do something, or is aware of the actions of another, which they consider to be wrongdoing, they can raise it using this procedure. The Discloser must have a reasonable belief that raising the concern is in the public interest.
13. A Discloser may decide to raise a concern under the whistleblowing policy if they are aware of a situation that they feel:
 - is against the LEP's procedures and protocols as set out in its code of conduct and individual LEP Assurance Framework;
 - falls below established standards of practice the LEP subscribes to;
 - amounts to improper conduct; or
 - is an abuse of power for personal gain
14. The types of matters regarded as a relevant concern for the purpose of this procedure include, but are not limited to, the following:
 - Fraud or financial irregularity;
 - Corruption, bribery or blackmail;
 - Other Criminal offences;
 - Failure to comply with a legal or regulatory duty or obligation;
 - Miscarriage of justice;
 - Endangering the health or safety of any individual;
 - Endangering the environment;
 - Improper use of authority; and
 - Concealment of any of the above.
15. Disclosers should not raise malicious or vexatious concerns, nor should they raise knowingly untrue concerns. In addition, this procedure should not be used to raise concerns of a HR/personal nature, such as, complaints relating to a management decision or terms and conditions of employment. These matters should be dealt with using the relevant alternative procedure, for example, the LEP grievance procedure. Equally, this policy would not apply to matters of individual conscience where there is no suggestion of wrongdoing by the LEP but, for example, an employee or LEP Board Member is required to act in a way which conflicts with a deeply held personal belief.

Safeguards

16. The [Public Interest Disclosure Act \(1999\)](#) gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The LEP believes that no member of staff should be at a disadvantage because they raise a legitimate concern.
17. The LEP will not tolerate harassment or victimisation and will take action to protect Disclosers when they raise a concern in the public interest.

Raising a concern

18. If a Discloser experiences something in the workplace which they consider a relevant concern, it is important that the concern is raised as early as possible. Proof is not required at this point – it is for the LEP to investigate. The Discloser must, however, have a reasonable belief that disclosing the information is in the public interest before raising a concern.
19. All concerns will be treated in confidence and every effort will be made to protect the Discloser's identity if they wish to remain anonymous. However, at the appropriate time, it is possible that the Discloser will need to come forward as a witness for the matter to progress.
20. It is important to follow the correct procedure when raising a whistleblowing concern. The following steps should be adhered to:
 - a. It is important that the concern is raised with the person best placed to deal with the matter, in most cases this will be the Responsible Officer. However, the Discloser may want to raise the concern with someone they know and trust, such as their line manager who can raise it with the Responsible Officer on their behalf.
 - b. If it is suspected that the concern may implicate the line manager in some way, then it could be raised with a more senior manager in the line management chain.
 - c. If the Discloser is unable to raise a relevant concern with a line manager or a senior manager or feel that it has not been adequately addressed, it should be raised directly with the Responsible Officer.
 - d. Ultimately, the Discloser can raise their concern with the LEP Chief Executive.

Information needed to raise a concern

21. When raising a concern under the procedure the Discloser should try to provide the following information:
 - The background and reason behind the concern;
 - Whether they have already raised a concern with anyone and the response; and
 - Any relevant dates when actions related to the concern took place.
22. This information should demonstrate that there are reasonable grounds for the concern to be acted upon. It is important that matters are not investigated by the Discloser themselves.
23. If applicable, personal interests must be declared from the outset.

How the concern will be handled

24. All investigations will be conducted sensitively and as quickly as possible. While the LEP cannot guarantee that the outcome will be as the Discloser may wish, it will handle the matter fairly and in accordance with this procedure.⁵⁰ All concerns will be treated in confidence and every effort will be made to protect the Discloser's identity if they wish to remain anonymous. However, at the appropriate time, it is possible that the Discloser will need to come forward as a witness for the matter to progress.
25. Once a concern has been raised with either the line manager or Responsible Officer, Senior Manager or Chief Executive, a meeting may be arranged with them to determine how the concern should be taken forward.
26. The LEP may decide to take the matter forward by a number of methods, including:
 - An internal inquiry or other formal investigation;
 - An internal or external audit;
 - Referring the matter to the police;
 - Referring the matter to another relevant authority for investigation.
27. Before a final decision is taken on how to proceed, or as part of the investigation, the Discloser may be asked to meet with those investigating their allegation.
28. If a meeting is arranged, the Discloser may wish to be accompanied by a trade union representative, colleague or friend. The person who accompanies the Discloser should not be involved or have a direct interest in the area of work to which the concern relates. The meeting can be conducted over the telephone rather than face to face.
29. Within 10 clear working days of a concern being raised, the LEP's Responsible Officer will write to the Discloser to:
 - Acknowledge that the concern has been received;
 - Indicate how they propose to deal with the matter;
 - Give an estimate of how long it will take to provide a final response;
 - Tell the Discloser whether any initial investigation or enquiry has been made;
 - Tell the Discloser whether further investigation will be made, and if not, why not;
 - Tell the Discloser how frequently the LEP will keep them up to date on progress of the investigation.
30. The amount of contact between the LEP and the Discloser concerned will vary depending on the concern raised, any difficult issues and any further clarity required. If necessary, the LEP will seek further information from the Discloser.
31. The LEP will confirm when the matter is concluded and, if appropriate, the outcome of the investigation, maintaining security and confidentiality for all parties as far as possible.

32. Throughout any investigation, the Discloser will still be expected to continue their duties/role as normal unless deemed inappropriate.

Confidentiality and anonymity

33. The LEP always encourages potential Disclosers to speak up about potential serious wrongdoing in a way that they feel comfortable. The best way to raise a concern is to do so openly, as this makes it easier for the LEP to investigate and provide feedback.
34. Any disclosures made under this procedure will be treated in a sensitive manner. However, the LEP recognises that the Discloser may want to raise a concern in confidence, i.e. they may want to raise a concern on the basis that their name is not revealed without their consent.
35. The LEP will respect any request for confidentiality as far as possible, restricting it to a 'need to know' basis. However, if the situation arises where it is not possible to resolve the concern without revealing the Discloser (for example in matters of criminal law), the LEP will advise them before proceeding. The same considerations of confidentiality should be afforded to the recipient(s) at the centre of the concern, as far as appropriate.
36. Disclosers may choose to raise concerns anonymously, i.e. without providing their name at all. If this is the case, the investigation itself may serve to reveal the source of information. Disclosers are therefore encouraged, where possible to put their names to concerns raised. When anonymous concerns are raised, they will be treated as credible and investigated so far as possible.

Protection

37. If a concern is raised in the reasonable belief that it is in the public interest and procedures have been followed correctly, the Discloser raising the concern will be protected by the terms of this policy and, where applicable, by whistleblowing legislation (see [gov.uk](https://www.gov.uk) for more information on who is covered by whistleblowing legislation). Where a Discloser has been victimised for raising a concern, the LEP concerned will take appropriate action against those responsible, in line with the LEP's disciplinary policy and procedures.

Changes to procedures or policy as a result of whistleblowing

38. If changes are made to LEP policies and processes as result of whistleblowing investigations, the LEP will publicise the changes as appropriate, taking into consideration the importance of protecting the anonymity and confidentiality of individuals.

Untrue allegations

39. If a Discloser makes an allegation but it is not confirmed by the investigation, no action will be taken against them. However, if a malicious or vexatious allegation is made without good reason to: cause trouble; for personal gain; or to discredit the LEP an investigation may take place. Where the Discloser is an employee or a LEP Board Member or a contractor this may result in disciplinary or other action if they have broken the terms of their employment, acted against the LEP Code of Conduct or broken a clause in a contract.

How this matter can be taken forward if you are not satisfied

40. This procedure is intended to provide Disclosers with an avenue to raise legitimate concerns. If you are either unable to raise the matter with the LEP or you are dissatisfied with the action taken you can report it directly to the Cities and Local Growth Unit in the Ministry of Housing, Communities and Local Government and the Department for Business Energy and Industrial Strategy, at the following email address: LEPPolicy@communities.gsi.gov.uk or by writing to: LEP Policy Deputy Director, Cities and Local Growth Unit, Fry Block, 2 Marsham Street, London, SW1P 4DF. You should clearly mark your email or letter as “Official - whistleblowing”.
41. In addition, if you are either unable to raise the matter with the LEP or you are dissatisfied with the action taken you may consider raising it with:
- The police;
 - The relevant regulatory body or professional body;
 - Your Trade Union;
 - Your solicitor;
 - Your Citizens Advice Bureau.

Further information and signposting for potential Disclosers is available on www.gov.uk.

42. If a Discloser does take the matter outside the LEP, to an external body, they should ensure they do not disclose information that is confidential, for example, if you are an employee your contract of employment may set out expectations of your regarding what is confidential.

Feedback on Whistleblowing Policy

43. Any feedback or comments on this policy should be directed to the LEP’s Responsible Officer.



Marches Local Enterprise Partnership: Register of Members' Interests

April 2017 to March 2018

As a Board Member/Co-opted Member of the Marches Local Enterprise Partnership (LEP), 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).*

21

NOTIFICATION OF CHANGE OF CIRCUMSTANCES

Each Board Member shall review their individual register of interests before each board meeting and decision-making committee meeting, submitting any necessary revisions to the LEP and S151/S73 Officer at the start of the meeting. Any recorded interests relevant to the meeting should also be declared at this point.

Even if a meeting has not taken place a Member must, within 28 clear working days of becoming aware of any change to the interests specified below, provide written notification to the LEP and S151/S73 Officer, of that change.

***SPOUSE/PARTNER** – In the notice below my spouse or partner means anyone who meets the definition in the [Localism Act](#), i.e. my spouse or civil partner, or a person with whom I am living as a spouse or a person with whom I am living as if we are civil partners, and I am aware that that person has the interest having carried out a reasonable level of investigation. Where your spouse or partner has recently been involved in any activity which would have been declarable, this should be mentioned, with the date the activity ended.

SECTION 1	ANY EMPLOYMENT, OFFICE, TRADE, PROFESSION OR VOCATION CARRIED ON FOR PROFIT OR GAIN	MYSELF	SPOUSE/PARTNER*
1.1	Name of: <ul style="list-style-type: none"> ○ 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
2.1	Any financial benefit obtained (other than from the LEP) which is paid as a result of carrying out duties as a Member. This includes any payment or financial benefit from a Trade Union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992 (a).		
SECTION 3	CONTRACTS	MYSELF	SPOUSE/PARTNER
	Any contract for goods, works or services with the LEP which has not been fully discharged by any organisation named at 1.1.		None
	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 business being decided by the LEP.		
SECTION 4	LAND OR PROPERTY	MYSELF	SPOUSE/PARTNER
	<p>Any 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 the LEP.</p> <p>This would include, within the area of the LEP:</p> <ul style="list-style-type: none"> ○ Any interest in any land in the LEP areas, including your place(s) of residency ○ Any tenancy where the landlord is the LEP and the tenant is a body in which the relevant person has an interest ○ Any licence for a month or longer to occupy land owned by the LEP. <p>For property interests, please state the first part of the postcode and the Local</p>		

	Authority where the property resides. If you own/lease more than one property in a single postcode area, please state this.		
SECTION 5	SECURITIES	MYSELF	SPOUSE/PARTNER
5.1	<p>Any 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 LEP; 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 an interest exceeds one</p>		

	hundredth of the total issued share capital of that class.		
SECTION 6	GIFTS AND HOSPITALITY	MYSELF	SPOUSE/PARTNER
	Any gifts and/or hospitality received as a result of membership of the LEP (above the value of £50).		

OTHER INTERESTS

Membership of Organisations

8

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

1. Anybody to which I have been appointed or nominated by the LEP:

--

2. Anybody exercising functions of a public nature (eg school governing body or another LEP):

--

3. Anybody directed to charitable purposes:

--

4. Anybody, 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.

MEMBER’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	
Member’s Name <i>(Capitals – in full)</i>	
Signature	

RECEIPT BY LEP

Date received by the LEP	
Signature of LEP Chief Executive	

RECEIPT BY S151/S73 OFFICER

Date received by the S151/S73 Officer	
Signature of S151/S73 Officer	

