



CAMBRIDGESHIRE
& PETERBOROUGH
FIRE AUTHORITY
Working together to improve community safety

CAMBRIDGESHIRE FIRE AND RESCUE AUTHORITY
LOCAL PENSION BOARD

CONFLICTS OF INTEREST POLICY

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1 Policy summary

- 1.1 This document sets out the conflicts of interest policy for members of the Local Pension Board (LPB) attached to Cambridgeshire Fire and Rescue Authority ('the Authority').

2 Introduction

- 2.1 The Public Service Pensions Act 2013 requires that LPB members must not have conflicts of interest, defined as a 'financial or other interest which is likely to prejudice the person's exercise of functions as a member of the board, but does not include a financial or other interest arising merely by virtue of membership of the scheme or any connected scheme'.
- 2.2 This policy is to ensure that, as required by law, the Scheme Manager (the Authority) can be satisfied that LPB members do not have any conflict of interest.
- 2.3 The LPB assists the Authority in the governance and administration of the pension scheme by ensuring compliance with Scheme Regulations, legislation and other regulatory requirements.
- 2.4 This policy is to be read alongside and complement the LPB's Code of Conduct.

3 Scope

- 3.1 This policy applies to those individuals appointed as members of the LPB attached to the Authority.

4 Principles for standards of conduct

- 4.1 LPB members must maintain an understanding and abide by the principles set out by the Nolan Committee on Standards in Public Life. These are:
- Selflessness - Holders of public office should act solely in terms of the public interest;
 - Integrity - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships;
 - Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias;

- Accountability - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this;
- Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing;
- Honesty - Holders of public office should be truthful;
- Leadership - Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

5 Causes and types of conflicts of interest

- 5.1 Conflicts of interest come into being where the LPB member's interest and responsibilities (or that of their spouse or partner) towards the LPB diverge; such that it could be reasonably questioned whether the actions or decisions of that person are influenced by their own interests. This would prejudice their ability to perform their LPB duties objectively.
- 5.2 LPB members must not subordinate their duty to their private interests, or put themselves in a position where duty and private interest conflict.
- 5.3 Only potential conflicts of interest can be managed as actual conflicts of interest are prohibited by law. A potential conflict of interest is one that has yet to materialise as an actual conflict of interest and is declared and managed so that it does not materialise.

6 Dealing with conflicts of interest

- 6.1 The LPB follows The Pensions Regulator's guidance on dealing with conflicts of interest by following the three steps of identification, monitoring and managing.
- 6.2 *Identification*
- 6.2.1 It is each LPB member's duty to declare any potential conflict of interest, or that of their spouse or partner, (including contracts, tenders, orders and favouritism) and this should be made to the Chair of the LPB in the first instance or to the Authority.
- 6.2.2 LPB appointments will be subject to disclosure of all interests and responsibilities that could be potential conflicts of interest through the completion of LPB Conflict of Interest Declaration form (DMS #454633).
- 6.2.3 Declarations will be recorded in the Register of Interests (DMS #419937) for retention by the Authority. Any information reasonably requested to be satisfied that there is no conflict must be provided by the LPB member in question.

6.2.4 The Register of Interests will be circulated to the LPB and Authority for review and publication. This may include being made publicly accessible on the Authority's external website or intranet at the Authority's discretion.

6.3 *Monitoring*

6.3.1 All LPB appointments will be regularly reviewed by the Authority and shall review and monitor the content of the Register of Interests.

6.3.2 At the start of each LPB meeting the Register of Interests should be reviewed by all LPB members. If a relevant interest has not yet been declared then it should be raised to the Chair of the LPB at that point by the affected LPB member and formally recorded in the meeting minutes. This requirement is ongoing throughout the LPB meeting.

6.4 *Managing*

6.4.1 If the LPB suspects a conflict of interest it must report this to the Authority.

6.4.2 When a conflict of interest is identified the Authority must decide whether this can be managed or not. It is for the Authority to make the final decision on whether an LPB member has a conflict of interest and the appropriate action.

6.4.3 When seeking to prevent a potential conflict of interest becoming detrimental to the conduct of decisions of the LPB, the LPB should consider obtaining legal and/or professional advice whilst assessing potential actions and response.

6.4.4 Unless dispensation has been granted, the LPB member may not participate in any discussion of, vote on, or discharge any duties related to any matter in which they have a potential conflict of interest.

6.4.5 The Authority can decide to exclude any LPB member with a conflict of interest from discussion on matters that relate to the conflict. This may include remaining in the meeting whilst the discussion is continued or could require the LPB member to leave the meeting whilst the discussion is held.

6.4.5 If the Authority decides that a conflict of interest is so significant that it cannot be managed the LPB member will be obliged to resign their post.