

Conflict of interest policy for Create Central Members

Conflict of interest – general principles

- 1.1 The work of Create Central must be carried out in an environment that is free from any suggestion of improper influence. Create Central must be able to publicly defend the actions of individuals in relation to this policy to prevent reputational damage. It is the Member's responsibility to bring potential or actual conflict of interests to the attention of the Chair or the WMCA Monitoring Officer as soon as they become aware of them.
- 1.2 Members must take steps to ensure that any conflict of interests to which they may be subject does not affect, or reasonably appear to affect, a decision taken by Create Central. Members must disclose all interests that could conflict, or appear to conflict, with their duties at Create Central. This includes any of their relevant interests, or the interests of their close family of which you are aware.
- 1.3 Members must not exploit, or reasonably appear to exploit, any personal or professional relationships with a relevant organisation (or an officer or employee of a relevant organisation) or an organisation with which Create Central has a contractual relationship (or an officer or employee of such an organisation).

What is a conflict of interests?

- 1.4 A conflict of interests arises when a Member's involvement with Create Central could be affected by a personal interest, personal association or personal interest or association of their close family. It becomes significant if an independent third party might reasonably take the view that there is a risk of their resultant actions (or those of a personal associate) being affected, whether or not they are actually affected. It includes situations where a relevant individual has an interest (whether personal or professional) in any dealing or business being considered by Create Central which may give rise to a perception of undue influence or that the individual concerned may not be wholly independent, disinterested and impartial when acting as a member of Create Central, in particular with regard to the exploitation of any property, information or opportunity.
- 1.5 Conflict of interests may arise in various ways. For example, as the result of:
 - a) a direct or indirect financial interest
 - b) a direct or indirect financial interest held by a commercial undertaking with which you have connections
 - c) a personal association or relationship with those affected, or likely to be affected, by the information or issue in question
 - d) an expectation of a future interest (for example, future employment)
 - e) in some cases, a previous association with the information or issue in question
 - f) a relevant interest of a close family member, in the types of circumstances set out above at a-e
 - g) an interest arising from a common interest grouping, such as a trade association or other public or private society.

This list is not exhaustive, nor will all of the examples necessarily give rise to significant conflict of interests. If a Member is in doubt about whether a conflict has arisen, they are to consult the Chair of Create Central or the WMCA Monitoring Officer.

Personal relationships

- 1.6** Members are required to disclose close personal relationships which could create or be perceived to create a conflict of interests, influence or unfair advantage. The interests of their partner (which is defined as your spouse/civil partner, or someone you are living with as husband or wife, or as civil partners) should be treated as though it was their own interest and should be disclosed accordingly.

Any other close personal relationship with an individual, or an organisation, that could reasonably give rise to an actual or perceived conflict of interests in relation to:

- a specific decision in which they are involved
- their work more generally, given their role and that of the individual or organisation in question.

Where a Member believes that a relationship with a product or service provider could give rise to a conflict of interests, they must disclose that fact to the Chair or the WMCA Monitoring Officer.

- 1.7** When appointed as a Create Central Member the individual must complete a disclosure of interests form with details of:
- a) personal relationships
 - b) any post, other employment, or fiduciary positions that they hold, or have held in the past five years in connection with a relevant organisation or an organisation that presently, to your knowledge, has a contractual relationship with Create Central
 - c) any other relationships that they have, including a professional, personal, financial or family relationship, held in connection with or capable of affecting a relevant organisation.

The Member must notify the Chair or WMCA Monitoring Officer immediately of any changes to the information disclosed.

- 1.8** The WMCA Monitoring Officer will keep a permanent record of all disclosures made under this section of the policy. That information will be kept confidential and will not be disclosed except where there is:
- a) a requirement for disclosure for the purposes of managing potential or actual conflicts
 - b) a requirement for disclosure for the purposes of disciplinary proceedings
 - c) any legal or regulatory obligation to disclose the information.

- 1.9** In addition to disclosures under 1.6 and 1.7 the Member should be alert to the possibility of conflict of interests arising when the business before Create Central or a Create Central Committee or arising in other circumstances relates in some way to your financial or other interests. When they identify such a potential conflict of interests, they should declare it to the Chair or the WMCA Monitoring Officer, in advance where possible. The Member should take the advised steps to manage or avoid the conflict as a result of this.

A general disclosure of interests under the provisions of the policy is not a substitute for making specific disclosures when you are faced with a potential conflict of interests in Create Central Board meetings, Create Central Working Groups or otherwise.