

CONFLICT OF INTEREST POLICY

DOCUMENT VERSION CONTROL

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Sept 2026	Anderson Strathern	1.1	FINAL	New standalone policy created as previously included in Anti-Bribery Policy

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1 Introduction

The purpose of this Policy is to protect the integrity, impartiality and reputation of SEStran by ensuring that actual, potential and perceived conflicts of interest are identified, declared and managed appropriately.

This Policy supports public confidence that decisions are taken solely in the public interest and are not influenced, or seen to be influenced, by personal interests or relationships.

2 Scope

- 2.1 This Policy applies to all persons working on our behalf in any capacity, including all employees, [Partnership Board Members], officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, and covers all activities undertaken by SEStran.
- 2.2 In our dealings with third parties¹, we will promote the adoption of practices and arrangements consistent with the principles set out in this Policy.
- 2.3 All individuals covered by this Policy must:
 - Act with integrity, honesty, objectivity and impartiality.
 - Avoid situations where personal interests conflict, or appear to conflict, with their official duties.
 - Declare interests promptly and fully.
 - Cooperate with any measures required to manage conflicts.
 - Place the public interest above personal, professional, financial or organisational interests.
- 2.4 Failure to comply with this Policy may result in disciplinary action or removal from a role, as appropriate.

¹ A “third party” is an individual or organisation that engages for business with SEStran e.g. external service providers, suppliers and contractors.

3 What is a Conflict of Interest?

3.1 A conflict of interest arises where an individual's private interests could improperly influence, or could reasonably be perceived to influence, the exercise of their official responsibilities.

3.2 It can occur when a person has a duty to more than one person or organisation but cannot do justice to the interests of both parties. This includes when an employee's personal interests are contrary to their loyalty to public service/business.

3.3 Conflicts may be:

- actual – direct conflict exists between official duties and personal interests
- potential – a personal interest could develop into a conflict in the future
- perceived – reasonable member of the public could conclude that personal interests might influence decision-making, even where no actual conflict exists.

3.4 Examples of Conflicts of Interest include:

- Having a financial interest (e.g. holding shares or options in a potential supplier or any entity involved in any tendering consortium)
- Having a financial or any personal interest in the outcome of the evaluation process
- Being employed by (as a staff member, official officer or volunteer) or providing services to any potential tenderer

- Being a member of a potential tenderer's management/executive board
- Receiving any kind of monetary payment or non-monetary gift or incentive (including hospitality) from any tenderer or its representatives
- Canvassing, or negotiating with, any person with a view to entering into any of the arrangements outlined above
- Having a close member of your family (which includes unmarried partners) or personal friends who falls into any categories outlined above
- Having any other close relationship (current or historical) with any other potential supplier or member of staff

4 Declaration of Interests

4.1 Individuals must declare interests:

- On appointment;
- When circumstances change; and
- Before participating in any decision, discussion or process where a conflict may arise.

4.2 Declarations should be made as soon as the conflict becomes known and should be made using the Conflicts of Interest declaration form at Annex A.

4.3 In addition, all employees who engage with external suppliers as part of their work or responsibilities are required to complete the Conflicts of Interest declaration form at Annex A annually or for specific procurement exercises.

4.4 If you are unsure whether you have a Conflict of Interest, or you have reason to believe a Conflict of Interest has not been declared by someone else, please contact the Partnership Director.

5 Managing Conflicts

- 5.1 If a Conflict of Interest is present, employees are required to update the Conflicts of Interest declaration form explaining the nature of the conflict to protect themselves and the organisation. This will then be assessed by the Partnership Director.
- 5.2 The decision as to whether the identified conflict is material, and whether any mitigating arrangements are required, is to be made by the Partnership Director.

6 Breaches of Policy

- 6.1 A failure to declare or properly manage a Conflict of Interest may constitute misconduct and will be dealt with in accordance with the Disciplinary Policy.
- 6.2 Deliberate concealment of a Conflict of Interest will be construed as unethical, will be treated very seriously and may constitute a matter of gross misconduct under the Disciplinary Policy. Such a breach of this Policy may also be dealt with as a criminal offence and lead to legal action.

7 Review

This Policy will be reviewed every two years by SEStran to reflect organisational changes, best practice, operational experience and legislative updates, in order to maintain its effectiveness.

Appendix A

Conflict of Interest Declaration Form

Name:	Job Title:
Tel:	Appointment / One-off / Annual / Specific Procurement

Conflict of Interests

A conflict of interest is where an individual's private interests could improperly influence, or could reasonably be perceived to influence, the exercise of their official responsibilities. This includes when a public official's personal interests are contrary to their loyalty to public business.

Examples of conflicts of interest include:

- Having a financial interest (e.g. holding shares or options in a potential supplier or any entity involved in any tendering consortium)
- Having a financial or any other personal interest in the outcome of the evaluation of any tender evaluation process
- Being employed by (as staff member or volunteer) or providing services to any potential tenderer.
- Being a member of a potential tenderer's management/executive board
- Receiving any kind of monetary payment or non-monetary gift or incentive (including hospitality) from any tenderer or its representatives
- Canvassing, or negotiating with, any person with a view to entering into any of the arrangements outlined above
- Having a close member of your family (which includes unmarried partners) or personal friends who falls into any of the categories outlined above
- Having any other close relationship (current or historical) with any potential supplier or member of staff

It is the employee's responsibility to ensure that any and all actual, potential or perceived conflicts of interest are disclosed to the Partnership Director, in writing, on an annual basis AND prior to them becoming involved in any procurement process. Individuals will be excluded from the procurement process where the identified conflict is material and cannot be mitigated. The decision as to whether the identified conflict is material, and whether any mitigating arrangements are required, is to be made by the Partnership Director.

You must complete at least two of the following sections INCLUDING Section 3:

1. No Conflict of Interest Exists

I do not have any Conflicts of Interest that prevent my full and unprejudiced participation in my duties, including any reason why I should not participate in any procurement exercises.

Signature:
Date:

2a. A Conflict of Interest Exists (about me)

I do have a conflict of interest that may prevent my full and unprejudiced participation in a procurement exercise or my duties. The nature of this conflict of interest is described below.

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2b. A Conflict of Interest exists (not directly related to me)

I want to declare where I believe a conflict to exist that is not directly linked to me. The nature of this Conflict of Interest is described below:

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3. I also declare that I will inform the Partnership Director and my Line Manager should my/any circumstances change in a way that affects this declaration.

Signature:
Date: