

Kent & Medway Local Skills Improvement Plan (LSIP)

Conflict of Interest Policy

Skills Advisory Panel & LSIP Partners

Version: 1.0 (Updated for Skills Advisory Panel)

Owner: Kent Invicta Chamber of Commerce (Employer Representative Body)

1. Purpose and context

This policy sets out how conflicts of interest are identified, declared, recorded and managed by Kent Invicta Chamber of Commerce, acting as the Employer Representative Body (ERB) chosen by the Department of Education to deliver the Kent & Medway Local Skills Improvement Plan (LSIP).

The LSIP is a strategic programme for Kent & Medway. The Skills Advisory Panel provides strategic oversight, challenge and direction to the development and ongoing implementation of the LSIP, and champions collaborative solutions between employers, providers and stakeholders across the region.

This policy supports the integrity of the LSIP's strategic governance and decision-making/endorsement processes (including scrutiny of LSIP-funded and LSIP-aligned activity) by ensuring that all partners involved act transparently and in the best interests of the Kent & Medway skills system.

2. Scope (concerned parties)

This policy applies to all individuals and organisations engaged in the delivery, governance and strategic oversight of the Kent & Medway LSIP, including:

- Members of staff working on the LSIP within Kent Invicta Chamber of Commerce
- Consultants and contractors engaged to support LSIP delivery
- Members of the Kent & Medway LSIP Skills Advisory Panel (including the Chair, Vice-Chair (if appointed), and any co-opted members)
- Attendees, observers and presenters participating in Skills Advisory Panel meetings where agenda items involve oversight, scrutiny, recommendations or endorsements
- Partner organisations and stakeholders involved in LSIP and LSIP-aligned activity, including employers, education and training providers, local authorities and

government agencies where they contribute to LSIP governance discussions or recommendations.

3. What is a conflict of interest?

A conflict of interest is any situation in which a concerned party has personal interests, or interests that they owe to another body, which may (or may appear to) influence or affect their judgement, advice or decision-making in relation to the LSIP.

Conflicts can be:

- Actual (currently influencing a matter)
- Potential (could influence a matter in future)
- Perceived (could reasonably be seen by others as influencing a matter)

4. Principles

In line with the strategic and collaborative role of the Skills Advisory Panel and the LSIP partnership, the following principles apply:

- Transparency – interests are declared openly and recorded appropriately
- Integrity – advice and recommendations are made in the best interests of the Kent & Medway skills system
- Proportionality – management actions reflect the level of risk posed by the conflict
- Accountability – the ERB and Panel Chair ensure conflicts are considered and managed consistently

5. Register of Interests

All concerned parties must complete a Register of Interests declaration when they become a concerned party (or as soon as practical thereafter) and must update their declaration whenever circumstances change.

Registers of Interests will be reviewed on an annual basis.

Where required for governance transparency, the ERB may publish or share an appropriate version of the Register of Interests in accordance with data protection requirements.

6. Declaring interest in meetings (Skills Advisory Panel)

At the start of each Skills Advisory Panel meeting, the Chair will ask all members and persons present to declare any conflict of interest in relation to items on the agenda.

Declarations (including “nil returns”) will be recorded in the meeting record/minutes and, where relevant, in a dedicated conflicts register, respecting confidentiality.

7. Managing conflicts

When a conflict is declared or identified, non-conflicted members (and the Chair/Secretariat) will consider the risk that the conflict poses to objective oversight, scrutiny, recommendations or endorsements.

Management actions may include one or more of the following:

- Noting the conflict and permitting the individual to remain for general discussion (low risk)
- Restricting the individual's participation (e.g., they may provide information but not advocate a position)
- Excluding the individual from discussion for the relevant agenda item
- Excluding the individual from any recommendation/endorsement relating to the matter
- In exceptional cases, asking the individual to withdraw from the meeting for that item

8. Roles and responsibilities

All parties concerned must:

- Act in the best interests of the LSIP and its partnership objectives
- Declare interests promptly and avoid the perception of bias
- Support agreed mitigation actions

The Skills Advisory Panel Chair must:

- Lead declarations of interest at meetings
- Ensure conflicts are assessed and management actions are agreed and recorded
- Escalate significant conflicts to the ERB governance lead where necessary

The LSIP Secretariat/ERB must:

- Maintain the Register of Interests and conflicts register
- Ensure annual refresh of declarations
- Provide guidance and reminders to concerned parties

9. Non-compliance

Failure to declare a relevant interest, or failure to comply with agreed mitigation actions, may result in actions including additional guidance/training, removal from a specific agenda item, or escalation to the ERB governance lead for consideration of continued membership/participation.

10. Related documents

This policy should be read alongside:

- Kent & Medway LSIP Skills Advisory Panel Terms of Reference (current version)
- Register of Interests and Declaration of Interest forms (LSIP 2026).

Appendix A – Summary of key updates from the previous version

This updated version:

- Replaces references to the “Solutions Panel” with “Skills Advisory Panel”
- Extends the scope to include wider LSIP partners and stakeholders involved in governance discussions.
- Aligns purpose and language to reflect the strategic oversight role of the Skills Advisory Panel and the strategic nature of the LSIP across Kent & Medway.