

POLICY ON REGISTER OF STAFF INTERESTS AND DECLARATIONS OF INTERESTS

1. Introduction

- 1.1 This policy defines standards and guidelines in relation to conflicts of interest, anti-bribery measures and the acceptance and provision of gifts and hospitality.

2. Register of Staff Interests – Senior Staff

- 2.1 Members of staff with budgetary or other significant authority must take proper account of any conflict of interest that may arise from their position within the University on the one hand, and membership of or connection with other bodies and individuals outside the University on the other. In this context the Chief Operating Officer will maintain a Register of Staff Interests, and additional specific requirements will also operate in relation to declarations of interest on an *ad hoc* basis. The procedures for the registration and declaration of interests are set out below.

- 2.2 All the procedures apply equally and specifically to:

- Vice-Chancellor
- Pro-Vice-Chancellors
- Executive Deans
- Deputy Deans
- Associate Deans
- Heads of Support Services
- Professors
- Professorial Equivalent Staff

- 2.3 However, the principles of impartiality and declaration of interest apply to the conduct of all members of staff of the University, whether or not they are specifically covered by this policy and the University's Register of Staff Interests.
- 2.4 The Chief Operating Officer will keep a Register of Staff Interests in which any third party pecuniary or non-pecuniary interests must be registered if the staff member considers that a conflict of interest could arise, or be perceived to arise. A nil return should be made where no such interests can be identified. Members of staff are asked to notify the Chief Operating Officer of any substantive changes in their registration whenever they occur, and the information held will be referred to the registered persons annually for amendment.
- 2.5 The Register of Staff Interests will be available for inspection by Officers of the University and to members of Council. The Register may be made available to other members of the University, and to members of the public, at the discretion of the Chief Operating Officer.

3. Declarations of Interest – All Staff

- 3.1** If any member of staff has a clear and substantial pecuniary or non-pecuniary interest, direct or indirect, in any matter under their consideration then it must, at the earliest possible opportunity, be disclosed to his or her Head of School/Department, whether or not that interest is included in the Register of Staff Interests. In such cases the Head of School/Department will be responsible for giving further consideration to the matter in relation to which the member of staff has a conflict of interest, and for reaching a decision thereon. Where an interest involves a direct or indirect financial benefit it will normally be necessary for the member of staff to withdraw from involvement. For these purposes the Vice-Chancellor will report, if required, to the Pro-Chancellor.
- 3.2** In all circumstances, members of staff must ask themselves whether members of the public, knowing the facts of the situation, could reasonably conclude that the interest involved might influence the approach they have taken in reaching the decision. If so, the interest must be deemed to be sufficient for the member of staff concerned to notify their Executive Dean/Head of Department, and to withdraw from participation.
- 3.3** Members of staff must also take care not to solicit or recommend any person for employment by the University or for admission to it, other than through the proper procedures, and must disclose if a candidate is related to them by family when providing testimonials of a candidate's ability, experience or character.