

Conflict of Interest Policy and Disclosure Procedures

Reference	UP02
Department	<i>Governance, Policy and Compliance</i>
Team	<i>Central Secretariat</i>
Type	<i>University/ Policy and Procedure</i>
Authority	<i>VCEG / ARAC / Board of Trustees</i>
Version	<i>Version 1.1.2024</i>

1.3 Compliance with this Conflict of Interest policy is compulsory for all those working

3. What is a conflict of interest?

- 3.1 A 'conflict of interest' is defined here as a situation in which the personal interests, relationships or loyalties to others of a staff member could, or could reasonably be seen to, prevent them from making a decision only in the best interests of the University.¹ The term 'conflict' is used interchangeably with 'conflict of interest' in this document.
- 3.1.1 An interest may be 'financial' – in the sense of representing something of material value such as pay, commission, consultancy fees, investments, royalties, gifts; or anything else of material value and which might reasonably be seen as capable of giving rise to a conflict.
- 3.1.2 An interest may be 'non-financial' in the sense of giving rise to an advantage or benefit such as access to privileged information or facilities; or the direct or indirect enhancement of an individual's career, education or personal reputation; or anything else of non-material value which might reasonably be seen as capable of giving rise to a conflict.
- 3.1.3 With reference to non-financial and financial interests alike, a conflict may arise in relation to any advantage or gain to the individual staff member of the University. Equally, members need to ensure that they are not involved in any activity or decision-making on behalf of the University which could give rise to benefit to their immediate family, or other individuals with whom the member has a close personal or business relationship; or to any outside organisation of which the individual is a member or to which they hold duties or loyalties and whose aims, values and interests do not (or might not be seen to) coincide with those of the University.
- 3.1.4 A 'perceived' conflict arises where an informed observer could reasonably infer that a decision or action you take on behalf of the University might be unduly influenced or compromised on account of an interest. Similarly, where an informed observer might reasonably consider that an interest could potentially give rise to a lack of objectivity or compromised judgement, this represents a 'potential' conflict.
- 3.1.5 Although everyone holds external interests and the holding of external 'interests' does not necessarily give rise to conflicts, it is important that members of staff of the University and individuals working on behalf of the University err on the side of caution when considering if it is necessary to disclose a conflict, taking into account the importance of avoiding not only actual conflicts, but also situations where it would be reasonable for someone to infer that their objectivity may have been compromised on account of a competing interest. However, if there is no discernible means by which an interest might reasonably be seen as impacting your objectivity in carrying out work on the University's behalf, then it follows that such an interest need not be disclosed.

¹ This definition is derived from that given by the Charity Commission for England and Wales.

4.

Members of the Board of Trustees and Collegiate Council, and senior officers: additional responsibilities

- 4.8 Members of the Board of Trustees and Collegiate Council, and senior officers of the University are additionally responsible for declaring any interests in the Annual Register of Interests (see Annex A) and to update any entries in the Register during a given year should the need arise. The Register is held by the University Secretary. If they have no interests to declare, they are still required to complete a return annually to confirm the same. Membership of a Federal Member of the University of London shall not normally be a registrable interest for this purpose.
- 4.9 The University Secretary will retain the Annual Register of Interests. Further details concerning this Register are included in Annex A, 'Annual Register of Interests'.

Chairs of University meetings

- 4.10 If you are Chair of any University meetings, you are responsible for managing any conflicts arising during these meetings.

Examiners for University of London Worldwide

- 4.11 If you are an Examiner responsible for setting or marking assessments for the University of London Worldwide and you have relationships with third party institutions (e.g. through teaching, revision classes, staff training, consultancy, or inspection), then you must upon appointment declare any payments or other benefits received in a separate Register of Examiners' Interests.

DISCLOSURE AND MANAGEMENT PROCEDURES

5. How and when should you declare an interest or make a disclosure.

Members of staff of the University

- 5.1 Members of staff have a duty to disclose any actual or potential conflicts of interest, and any situations that might give rise to their being perceived as being compromised by a conflict.
- 5.2 Members of staff must disclose in writing any conflicts of interest by contacting their line manager or head of division (or equivalent) for the relevant area of activity within which the conflict has arisen. The line manager or head of division (or equivalent) should make a written record of the disclosure, and of any action taken to manage the conflict in line with requirements set out in Section 6.
- 5.3 Members or attendees of University committees should declare any interest in relation to any item on a meeting agenda at the start of the meeting. The chair should ensure a record of the disclosure is kept, and of any action taken to manage the conflict in line with requirements set out in Section 6.

6. How are conflicts of interest managed?

Members of the Board of Trustees and Collegiate Council, and senior officers

- 6.1 In the case of Members of the Board of Trustees and Collegiate Council, and senior officers of the University, the University Secretary (or their delegee) will act as reviewer, seeking appropriate advice where necessary.
- 6.2 In the event of a significant and irresolvable conflict of interest arising, a member of the Board of Trustees may totally recuse themselves, or be asked to totally recuse themselves, from the committee.

Members of staff of the University

- 6.3 In the case of other members of staff, any conflicts of interest should be disclosed to the individual's line manager or head of division (or equivalent). The line manager or head of division (or equivalent) will act as reviewer, seeking advice where they feel this is necessary from the divisional head (where they are not the reviewer) and/or relevant Pro Vice-Chancellor responsible for the affected area of work.
- 6.4 The reviewer should evaluate the nature and severity of the conflict, and then determine the appropriate and proportionate measures to be taken which may include that the individual manage the conflict by:
 - x not participating in projects,
 - x not participating in discussions and/or decision-making in relation to relevant activity,
 - x temporarily suspending participation in an external

6.8 In the specific case of conflicts of interest arising during University meetings, the chair of the meeting will be responsible for determining if any person declaring an interest during a University meeting should:

- x leave the meeting,
- x absent themselves from any part of the discussion and/or vote taken on the item, or
- x in exceptional cases, stand down from the committee.

Annex A. The Annual Register of Interests

- (a) The University Secretary is responsible for the maintaining of an Annual Register of Interests of the members of all the committees constituted under its Statutes and Ordinances, as well as its senior officers. The purpose of the Register is to provide information about members' interests including those which others might reasonably think could influence the actions and decisions of any individual required to make an entry in the Register. It is updated annually and (as per regulatory expectations) is