

Register of Interests Policy

1. Introduction

The University is committed to maintaining the highest standards in the conduct of its business. This requires everyone associated with the University to conduct themselves with integrity, impartiality, honesty and professionalism at all times, and to avoid any conflict arising between their official University duties and their private interests.

The University recognises that staff and lay members of Senate/University Committees require freedom to engage in external activities but, in undertaking these, mechanisms must be in place to protect individuals, and the University itself, from any potential for reputational damage.

In this context, this policy provides guidance to staff and to lay members of Senate/University Committees on how to effectively minimise and manage potential conflicts of interest, and to ensure best practice by:

- (i) Ensuring all individuals make decisions free from bias;
- (ii) Guarding against conflicts of interest which may arise due to the positions held by individuals; and
- (iii) Protecting the University, and those individuals covered by the policy, against impropriety, or the appearance of impropriety, including reputational risk.

2. Other Relevant Policies

This policy should be read in conjunction with the following University policies and procedures:

- Policy on the Acceptance of Gifts, Gratuities and Hospitality;
- Guidance Policy on Staff Relationships;
- Code of Good Conduct in Research;
- Policy on Ethical Approval of Research;
- Research Misconduct Regulations;
- Grievance and Disciplinary Procedures;
- Financial Procedures Manual (including the University's Regulations, Guidelines and Procedures for the Procurement of Goods and Services).

Under their contract of employment with the University, academic staff are permitted to undertake private consultancy, where this does not exceed 30 days per annum. Staff should refer to the Guidance on the University Consultancy Scheme.

It should also be noted that conflicts of interest may arise from remunerated or honorary positions and related connections with other educational institutions (including universities, further education colleges and/or schools); and/or from public appointments (paid or unpaid) or election to office. Staff wishing to accept such positions, whether remunerated or not, should seek prior approval under the appropriate procedures. Once approved, the individual's entry on the Register of Interest should be immediately updated.

3. Scope of the Policy

The policy applies to all University members, defined as follows:

- All staff employed by the University;
- Anyone affiliated to the University through honorary contracts (e.g. visiting academics, visiting researchers and honorary academics);
- Lay members of Senate and University Committees, to include co-opted appointees;
- All third parties retained by the University to perform services for, and on behalf of, the University.

In making a declaration under this policy, individuals should be aware that conflicts of interest may arise from not only their own employment, investments and other activity, but also from those of their partner, spouse or close family members.

This policy does not extend to the University's related companies – these companies are responsible for developing and maintaining their own Register of Interests policies and for ensuring appropriate compliance.

4. What constitutes a Conflict of Interest

"Conflicts of Interest" arise where an individual is in a position to influence, directly or indirectly, University business for their own personal benefit, or that of their family or others, but to the detriment of the University. These are situations in which personal or financial considerations may compromise, or have the appearance of compromising, an individual's professional judgement, integrity, impartiality and/or honesty, in relation to the conduct of their official responsibilities on behalf of the University.

Conflicts of interest may also include "Conflicts of Commitment", which exist when individuals undertake external activities which are so demanding in terms of time and/or attention that they interfere with that individual's duties/responsibilities to the University.

Examples of potential conflicts of interest are detailed below:

(i) Conflicts of Educational Mission

University employees involved in educating, training, supervising or directing the work (education) of students should ensure that the services they provide are appropriate to the student. For example, care should be taken to ensure that the choice of a student's research project, and the direction of that research is not, and does not appear to be, influenced by their supervisor's personal or financial interests.

(ii) Conflicts of Research Integrity

University employees should maintain the highest standards of integrity in the conduct of research. The complete, objective and timely dissemination of new findings through publications is essential for research integrity. The potential for personal gain must not jeopardise, nor appear to jeopardise, the integrity of research activities, including the choice of research, its design, the interpretation of results, or the reporting of such results.

(iii) Conflicts of Financial Interest

University employees have a responsibility to respect and promote the financial interests of the University. Staff should, wherever possible, ensure that the University receives appropriate financial return from the following activities:

- The provision of research and consultancy services, conducted through the University;
- The use or commercialisation of its intellectual property;
- The use of other resources and assets, including equipment, technical staff and facilities;
- The use of its financial resources in relation to the purchase of goods and services, as outlined in the University's Financial Regulations.

(iv) Conflicts of Commitment and Loyalty

Members of staff and lay members of Senate/University Committees, in discharging their University responsibilities, owe their primary commitment and allegiance to the University. Individuals holding external appointments will be obliged to act in the best interests of that external body and, on occasion, these duties may conflict with the individual's obligations as a member of the University.

Where an appointment to an external body is approved through the appropriate procedures, the individual, in consultation with their Head of School/Director, must ensure that any conflict of commitment is effectively managed. This also applies to academic staff undertaking assignments through the University's Consultancy Scheme.

The above examples are not meant to be exhaustive. The primary obligation rests with each individual to recognise situations in which he/she has a potential conflict of interest, and to raise this conflict in line with the approved policy.

Individuals should always disclose an activity if they are in any doubt as to whether it represents a conflict of interest. Disclosure should be made at the appropriate time (i.e. before they engage in the activity), and through the regular updating of their Register of Interests entry.

5. Disclosure and Review of Interests

5.1 At meetings of Senate/University Committees/Working Groups

During the course of a meeting, individuals need to be vigilant in raising any conflict of interest, as soon as they become aware of it, so that appropriate action can be taken.

The Chair will advise on the action required to resolve any conflict of interest which becomes apparent at a meeting – this may include the individual not taking part in the discussion on the item, and/or not voting on it, and/or ceasing to be counted towards the quorum necessary for taking a decision. Individual members may also be advised to withdraw from the meeting for the duration of the discussion.

Where the Chair of a Committee/Working Group declares an interest, a Deputy Chair should be appointed and the Chair should not participate in the relevant discussions and/or should withdraw from the meeting for the duration of the discussion, as appropriate.

All declarations of interest, along with the actions taken in relation to these, should be recorded in the minutes.

5.2 In the Course of University Business

The formal process for managing individual instances of actual or potential conflicts of interest, arising in the course of University business, is described in the Register of Interests – Procedure, attached as Annex A.

In essence, any individual who believes they may have a conflict of interest should, in the first instance, consult their Line Manager. Members of Senate/University Committees should raise this matter directly with the Registrar and Chief Operating Officer, in his capacity as Secretary to Senate.

Individuals are required to declare any professional, commercial, academic, or other interest that may conflict with the interests of the University, or which may be seen, by reasonable members of the public, to influence or bias judgement, when discussing or reaching decisions.

It is impossible to describe a comprehensive set of rules on interests. Individuals are best placed to know their responsibilities within the University and within other bodies and where these have the potential to conflict. Conflicts of interest may arise from:

- (a) Directorships, including executive and non-executive, of public or private companies likely, or seeking, to do business with the University or with any of its associated or related companies.
- (b) Employment by public or private companies likely, or seeking, to do business with the University or with any of its associated or related companies.
- (c) Significant shareholdings in public or private companies likely, or seeking, to do business with the University or with any of its associated or related companies (NB: Significant shareholdings may be considered to be 2% or more of the issued share capital).
- (d) Remunerated or honorary positions, and related connections, with other educational institutions (including universities, further education colleges and/or schools).
- (e) Public appointments (paid or unpaid) or election to office.

If in doubt, individuals should seek clarification from their Line Manager in a timely manner.

5.3 In the Procurement of Goods and Services

Specific declarations are also required from those directly involved in the management and operation of the University's approved purchasing regulations. In this context, all staff, in requisitioning and/or purchasing goods and services, are required to complete a standard pro-forma to confirm the following:

"I have no related interest in this requisition as outlined in the University's Regulations, Guidelines and Procedures for the Procurement of Goods and Services."

While the implementation of the new Procure to Pay system (P2P) will involve changes to the requisitioning and approval process, the underlying principles, regarding the need to avoid conflicts of interest, will remain.

Further information on these regulations, guidelines and procedures is available on the Finance Directorate website.

5.4 Through the Annual Reporting Cycle

The Registrar's Office will issue an annual communication reminding staff and lay members of Senate/University Committees to review their Register of Interests entry within Queen's Online to ensure that this remains accurate and up-to-date. Staff, with no interests to declare, must also maintain the record held within Queen's Online.

Declarations will continue to be accepted from lay members of Senate and University Committees, either in hard copy, or electronically, by email and through the Senate Portal.

6. Implications of non-compliance

Failure to avoid conflicts of interest, or to adequately disclose and manage unavoidable conflicts of interest, may result in:

- Damage to the reputation of the University and to the individual(s) involved;
- Loss of public trust in the University and its related activities;
- The inability of the University and/or the individual to respond to accusations of personal benefit.

Failure to declare a significant interest is potentially a disciplinary matter and staff and lay members of Senate/University Committees are, therefore, advised to declare such an interest if they are in any doubt about its relevance or materiality.

7. Annual Report to the Audit Committee

Under the new Approval Framework, approved by Senate in June 2011, consideration and approval of the University's Register of Interests Policy is formally delegated to the Audit Committee.

In this context, an annual Register of Interests Report will be presented to the Audit Committee, at its October meeting each year, for consideration and approval. This report will provide the following information/assurances:

- (i) A review of the policy itself, to include proposals in respect of any required amendments – this review will ensure that the policy is regularly updated to capture best practice and emerging issues across the sector.
- (ii) A summary on the number and source of declarations submitted, and the steps being taken to ensure full compliance in this respect.

Appropriate reference to this report will also be included in the Annual Report of the Audit Committee, presented to Senate in November of each year.

8. Further Information

Further information on this policy is available from the Registrar's Office, Lanyon South.

Register of Interests – Procedure

1. Purpose

- 1.1 As set out in Section 4 of the Register of Interests Policy, a conflict of interest arises where an individual is in a position to influence, directly or indirectly, University business for their own personal benefit, or that of their family or others, but to the detriment of the University.
- 1.2 To enable the University to safeguard against potential conflicts of interest, the Registrar's Office maintains an institutional Register of Interests. It is the responsibility of all staff and members of Senate/University Committees to ensure that their entry on this Register, which is accessible via Queen's Online, is updated to reflect any changes in their personal circumstances.
- 1.3 Any action or involvement or interest which may be seen to lead to a conflict of interest should be disclosed immediately and acted upon as set out in Section 2 below.
- 1.4 Full disclosure, supported by effective monitoring and conflict management, is critical in the prevention and resolution of conflict situations. Full disclosure of relevant information is in the best interests of both the institution and the individual, given that this demonstrates good faith on the part of the individual and protects his/her reputation and that of the University.

2. Approval Arrangements – Members of Staff

- 2.1 Members of staff are personally responsible for disclosing potential conflicts of interest and/or commitments. The member of staff should, in the first instance, disclose the potential conflict to his/her Line Manager.
- 2.2 Disclosure in all cases should include the following:
 - Details of the potential conflict of interest or commitment;
 - The nature of the activity;
 - A description of all parties involved;
 - The potential financial interests and rewards;
 - Possible violations of legal requirements;
 - Any other information which the individual feels necessary to evaluate the disclosure.
- 2.3 The Line Manager should advise the Head of School/Director of all disclosures. The Head of School/Director may also serve as an advisor to staff members who are uncertain regarding the appropriateness of a given activity or management of a given disclosure issue. In formulating a decision, the Head of School/Director may also need to consult with other appropriate Senior Officers within the University.
- 2.4 The Line Manager will evaluate any disclosure received in line with the process detailed in Section 4 below.
- 2.5 After appropriate evaluation, the Line Manager may find that the proposed activities create no conflict or apparent conflict and are acceptable without further review. Conversely, the Line Manager may determine that the circumstances have the

potential to create a conflict – where this is the case, the Line Manager should seek guidance from the relevant Head of School/Director.

- 2.6 For each situation, the Line Manager should create a written record of his/her determination that the situation is either acceptable, unacceptable, or requires review at a higher level. A template is attached as Annex 1.

3. Approval Arrangements – Members of Senate/University Committees

- 3.1 Members of Senate/University Committees are personally responsible for disclosing potential conflicts of interest and/or commitments. Any potential conflict should be disclosed, in the first instance, to the Registrar and Chief Operating Officer, in his capacity as Secretary to Senate.

- 3.2 Disclosure in all cases should include the following:

- Details on potential conflict of interest or commitment;
- The nature of the activity;
- A description of all parties involved;
- The potential financial interests and rewards;
- Possible violations of legal requirements;
- Any other information which the individual feels necessary to evaluate the disclosure.

- 3.3 The Registrar and Chief Operating Officer may also serve as an advisor to members of Senate/University Committees who are uncertain regarding the appropriateness of a given activity.

- 3.4 The Registrar and Chief Operating Officer will evaluate any disclosure received in line with the process detailed in Section 4 below.

- 3.5 In formulating a decision, the Registrar and Chief Operating Officer may also need to consult with appropriate Senior Officers within the University and/or with the Standing Committee, as appropriate.

4. Evaluating Disclosures

- 4.1 For the purposes of this policy, the individual evaluating the disclosure will be referred to as the Reviewing Officer.

- 4.2 When presented with the facts of a given situation, the Reviewing Officer must first determine if a conflict, or perceived conflict, of interest exists.

- 4.3 If it appears that there is no conflict, or perceived conflict, of interest, the Reviewing Officer should inform the individual that the proposed activity may proceed.

- 4.4 If there is a genuine cause for concern, the Reviewing Officer must ascertain whether it would be possible to introduce controls to effectively manage any potential conflict. Where this would be appropriate, the controls should be discussed and an action plan for their implementation/ongoing evaluation agreed with the individual.

- 4.5 Where it is not possible to effectively control/manage the conflict, the Reviewing Officer should advise the individual that the proposed activity should not be supported.

- 4.6 If the Reviewing Officer is uncertain as to the correct way in which to deal with a situation, they should refer the matter to the next level of management, and/or seek appropriate professional advice from the relevant Academic Support Director. In these circumstances, the new decision-maker assumes the role of the Reviewing Officer.
- 4.7 In all cases, the disclosure and the decision of the Reviewing Officer should be noted on the individual's personnel file. The individual should also be asked to record this interest on their Register of Interests entry, available through Queen's Online.
- 4.8 Where an individual feels that the decision of the Reviewing Officer is not appropriate, he/she may request that this decision be reviewed by the relevant Head of School/Director.

5. Further Information

Further information on the implementation of these procedures is available from the Registrar's Office.

Approved: October 2015

THE QUEEN'S UNIVERSITY OF BELFAST

Register of Interests: Authorisation FormPersonal Details:

Name: _____

Position: _____

School/Directorate/Unit: _____

1. Do you hold any directorships, including executive and non-executive directorships, in any public or private companies which are likely, or possibly seeking, to do business with the University or with any of its associated or related companies?

Please tick:

Yes No

If yes, please provide full, relevant details in the space below:

Role	Company	Duration of Appointment

2. Are you employed by any public or private companies which are likely, or possibly seeking, to do business with the University or with any of its associated or related companies?

Please tick:

Yes No

If yes, please provide full, relevant details in the space below:

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3. Do you have significant shareholdings in any public or private companies which are likely, or possibly seeking, to do business with the University or with any of its associated or related companies?

NB: Significant shareholdings may be considered to be 2% or more of the issued capital.

Please tick:

Yes No

If yes, please provide full, relevant details in the space below:

4. Do you own or have partial ownership in any organisations or consultancies which are likely, or possibly seeking, to do business with the University or with any of its associated or related companies?

Please tick:

Yes No

If yes, please provide full, relevant details in the space below:

5. Are you employed by any consultancies which are likely, or possibly seeking, to do business with the University or with any of its associated or related companies?

Please tick:

Yes No

If yes, please provide full, relevant details in the space below:

6. Do you hold any remunerated or honorary positions and other connections with other educational institutions (including universities, further education colleges and/or schools)?

Please tick:

Yes No

If yes, please provide full, relevant details in the space below:

7. Do you hold any public appointments (paid or unpaid) or elected office?

Please tick:

Yes No

If yes, please provide full, relevant details in the space below:

8. Do you hold any other positions or have any other connections, including those with voluntary bodies or charities?

Please tick:

Yes No

If yes, please provide full, relevant details in the space below:

I confirm that I have read and understood the University's Register of Interests Policy and complied with the University guidance relating to its Declaration of Interests as noted above. The interests I have declared include both direct and indirect interests (i.e those of a partner, spouse or close relative) and any specific financial interests are shown.

Signed: _____ Date: _____

Print Name: _____ Position: _____

Evaluation by Reviewing Officer

Please confirm the appropriate decision:

I confirm that I have evaluated the above declaration of interests and confirm that no conflict of interest exists.

I confirm that I have evaluated the above declaration of interests and believe that a conflict of interests exists. The following proposed action should, therefore, be implemented to effectively manage the conflict:

Action:

I confirm that I have evaluated the above declaration of interests and confirm that a conflict of interest exists. The proposed activity should not be supported.

Signed _____ Date _____
(Line Manager)

Print name _____ Position _____

School/Directorate _____

I note the decision of my Line Manager.

Signed _____ Date _____
(Staff Member)

Print name _____ Position _____

School/Directorate _____

On completion: Please return the form to your Line Manager and ensure that your entry on the University's Register of Interests is updated through Queen's Online.