

# Register of Interests Policy





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## 1 Introduction

- 1.1 The University is committed to the highest standards of openness, integrity and accountability. It seeks to conduct its affairs in a responsible manner, having regard to the principles established by the Committee on Standards in Public Life. In addition, the University expects that Council and Executive Board members and staff at all levels will observe the ethical principles and standards set out in the University Ethical Framework.

## 2 Scope

- 2.1 This Policy applies to:
- 2.1.1 All members of University Council and University Senate;
  - 2.1.2 All members of the Executive Board;
  - 2.1.3 Senior members of University staff;
  - 2.1.4 Other staff members who are also budget holders
  - 2.1.5 All other University staff as applicable

## 3 General principles/Policy statements

- 3.1 The following principles shall apply to all members of Council, Executive Board and other University staff:
- 3.1.1 Individuals should disclose in the University Register of Interests (Register) any interest, financial or otherwise, which is likely or would, if publicly known, be perceived as being likely to influence the exercise of independent judgement.
  - 3.1.2 The Register does not cover all interests, but specifically those relevant or potentially relevant, to an individual's role as a member of Council, the executive Board or another member of University staff.
  - 3.1.3 Individuals are responsible for declaring any relevant interests they may have in relation to their role.

- 3.1.4 Interests of close relatives may be declared if it is considered that these interests are such that they may, or may be perceived to, influence the exercise of independent judgement.
- 3.1.5 Where an individual has previously had an interest that may not need to be recorded in the Register, that individual must still declare such previous interest when undertaking any University activity, including but not limited to any procurement activity, to which the previous interest may be relevant.
- 3.1.6 For the avoidance of doubt, the Register of Interests does not obviate the duty of Council members, Senate Members and members of the Executive Board or the requirement for other senior staff and budget holders to declare relevant interests at any meeting they may attend or when participating in other relevant University activities or business.
- 3.1.7 The Register of Interests of Council Members and members of the Executive Board will generally be made publicly available, unless there are compelling reasons for why a particular interest cannot be made publicly available.
- 3.1.8 If an individual is in doubt about whether to declare an interest, they should seek guidance from the Legal and Governance Department.

## 4 Implementation

- 4.1 Council members, Senate members, members of the Executive Board, senior members of staff and any other member of staff who is also a budget-holder must complete and return a signed declaration of interest form, including a nil return if appropriate, at least on an annual basis and more frequently should their interests require to be updated before the annual review.
- 4.2 In addition, any other members of staff who are in an advisory position, exercising influence on large resource or policy decisions and who believe there may be an actual or potential conflict of interest are also required to complete a declaration of interest form.

- 4.3 The Register of Interests Procedure sets out the detail of how this Policy will be implemented.

## **5 Compliance**

- 5.1 It is the responsibility of those to whom this policy applies to ensure that they maintain an accurate and up-to-date register of interests with the University. As such, should an individual not comply with this policy, this may be a matter that gives rise to a conduct review or may result in an individual being removed from office or other position held within the University, depending on the circumstances.
- 5.2 Any concerns about a possible conflict of interest, or other non-compliance with this policy, must be notified to the University Secretary, who will be responsible for determining whether there has been a breach of this policy investigating the concern. Where a concern relates to the University Secretary, this must be notified to the Vice-Chancellor who will determine the appropriate officer to conduct the investigation into the concern.
- 5.3 Any material breaches of this policy by members of the University Council or Executive Board shall be reported to the Audit Committee.
- 5.4 Any report from an individual made under section 5 of this policy will, as far as practicable, be kept confidential. It may be required to disclose elements of the report in order to effectively investigate the matter or to ensure natural justice and procedural fairness in the investigation of any non-compliance.

## **6 Monitoring and review**

- 6.1 This policy will be reviewed on an annual basis

## **7 Related policies and standards/documentation**

- 7.1 The following Policies are related to this policy:
- 7.1.1 Ethical Framework
  - 7.1.2 Financial Regulations
  - 7.1.3 Council Member Handbook