

Conflict of Interest Policy

Scope

This policy applies to members of UEA Council, staff (employees and workers) of the University and its subsidiary companies, students registered at UEA, external members of UEA Committees, and those working at UEA in other capacities.

Policy Statement

The aim of this policy is to

- raise awareness so actual and perceived conflicts of interest are recognised
- ensure everyone is aware of their obligations to disclose conflicts of interest and maintain high ethical standards
- ensure actual and perceived conflicts of interest are always disclosed;
- ensure that in the event a conflict arises it can be properly managed or avoided to ensure that all business decisions are made in the best interests of UEA; and to
- prevent damage to the reputation of the Council member, staff member or student in question, or UEA as an institution.

1. University's purpose

The University was founded in 1963 for the advancement of:

- education and research for the public benefit
- knowledge, the diffusion and extension of arts, sciences and learning, the provision of liberal, professional and technological education.

2. Principles

Everyone covered by this policy has a duty to be open and honest where a personal or business relationship may, or may be perceived to, influence the operation of University business. While personal privacy will be protected as far as practicable, transparency is paramount.

2.1. Expectations

Everyone covered by this policy is expected to:

- a) maintain the highest possible standard of integrity in all business relationships, both inside and outside of UEA.
- b) reject any business practice which might reasonably be deemed improper (including improper practices which might benefit UEA.
- c) never use authority or position for personal gain.

- d) at all times, act with impartiality, independence and integrity.
- e) avoid being, or giving the appearance of being, in a position which may result in an actual or perceived detriment to UEA's reputation and/or interests.

2.2. Disclosure

Everyone covered by this policy is expected to disclose or to seek direction on any issues which may potentially conflict with their responsibilities to UEA.

2.3. Restrictions

Everyone covered by this policy will not be permitted to engage in transactions on behalf of UEA with organisations or individuals with which they have an interest. All decision making and transactions with the organisation or individuals concerned will be handled and managed independently.

3. Making declarations – Register of Interests

3.1. The University will maintain two registers of interest: one for members of UEA Council and Statutory Officers to declare

- Names of firms or organisations in which they have a substantial interest
- Personal or family interests in University employees and students
- Personal interests in other Higher Education Institutions

This register will be publicly available.

3.2. The second register will be for a range of senior staff and staff working in key areas to declare their interests and which will be available internally within UEA and open to public inspection on request. Senior staff will include the following roles

- Provost, Pro-Vice Chancellors
- Academic Directors
- All Heads of School
- All Directors of University Services, Associate Directors/Heads of Service
- Directors of UEA subsidiary companies
- Staff working in key areas such as procurement

Interests will include such things as:

- Names of firms or organisations in which they have a substantial interest
- Personal or family interests in University employees and students
- Personal interests in other Higher Education Institutions

3.3. Those making declarations will be invited to update their entries annually.

4. Making declarations - Conduct of business

- 4.1. Council and Senate and their sub-committees will have as an agenda item at every meeting an opportunity for anyone present to declare an interest in an agenda item, transaction or decision where there may be a conflict between the University's best interests and their best interests. If in doubt the potential conflict must be declared anyway and clarification sought.
- 4.2. The Council member or staff member who has declared the conflict of interest shall withdraw from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organisation or person. This action should be recorded in the Minutes.

5. Making declarations – Other staff

- 5.1. All staff (employees and workers) must declare personal relationships with other staff, students and applicants and business relationships and appointments where there is, or could be perceived to be, a conflict of interest such as
 - where the staff member has a role which has, or could be perceived as having, a position of direct or indirect managerial, budgetary or academic authority in connection with the person with whom he/she has a personal relationship; and/or
 - the ability to influence decisions or give unfair advantage or disadvantage to the person with whom he/she has a personal relationship.
- 5.2. Staff have a responsibility to use their judgement when making declarations and any such declarations should be made by the member of staff to their manager. This will help staff to avoid actual and perceived conflicts of interest and misuse of authority. It also serves to protect members of staff in personal relationships from allegations of bias, conflict of interest or impropriety.

6. Action taken when declarations are made

- 6.1. Registers of Interests for Council members and staff in senior roles will be updated annually and published as detailed above.
- 6.2. When an interest has been declared via the Register or by a member of staff to their manager it will be recorded on their staff file and consideration must be given to putting a management plan in place. Plans might include ensuring the staff member:
 - does not take part in discussions of certain matters;
 - does not take part in decisions in relation to certain matters.
- 6.3. When a personal relationship has been declared by a member of staff it will be recorded on their staff file and consideration must be given to putting a management plan in place. Plans might include ensuring the staff member:
 - does not take part in discussions of certain matters;
 - does not take part in decisions in relation to certain matters.and if the relationship is with a student it may include ensuring:

- the staff member does not play any part in the assessment of a student and /or decisions about their progression and degree classification
- the staff member resolves not to act as a particular person's supervisor;
- a trace is placed on the student's record so amendments can be tracked.

7. Undisclosed conflicts

- 7.1. Any member of staff or student who is concerned that there may be an undisclosed conflict of interest should inform their Head of School or Director of University Service.
- 7.2. The failure of staff to disclose a possible, perceived or actual interest that comes to the University's attention via other means may result in disciplinary action.

8. Records management

- 8.1. The registers of interests will be updated annually, and records of previous year's declarations held for a period of seven years in line with financial records.
- 8.2. Staff records will be updated when notified do to so by staff who have made declarations. and records of previous year's declarations held for a period of seven years in line with financial records.

9. Related University Polices

The University has a number of other related polices and these are listed below.

1	Financial Regulations	<p>Practical guidance the University's broad policies relating to financial control. Compliance with the Financial Regulations and Financial Procedures is compulsory for anyone with a contractual relationship with the University (this includes all employees and honorary staff).</p> <p>Accessed via the Finance Regulations and Procedures section of the policy list.</p>
2	Anti-fraud and corruption Policy	Accessed via the Finance Regulations and Procedures section of the Policy list
3	Anti -bribery Policy	Accessed via the Finance Regulations and Procedures section of the Policy list
4	Expenditure, Procurement and Purchasing of goods and services	The Financial regulations detail appropriate policies and procedures Accessed via the Finance Regulations and Procedures section of the Policy list
5	Authorisation of financial transactions and Authorised signatories process and records	<p>This is documented in the Financial regulations - Section C iv (Financial Management and Control)</p> <p>Accessed via the Finance Regulations and Procedures section of the Policy list</p>
6	University Consultancy policy	Accessed via the "How RIN can help" section of Consultancy and Contract Research web page
7	Private Work and other appointments	<p>This is documented in the Financial regulations - section C vii</p> <p>Accessed via the Finance Regulations and Procedures section of the Policy list</p>
8	Policy for Approving the Integrity of UEA Research and Innovation Related Activities and Funding	Accessed via the RIN section of Policy list .
9	Intellectual Property Regulations	Accessed via the Intellectual Property Regulations webpage (part of the General Regulations)
10	Public Interest Disclosure	Public Interest Disclosure – A procedure for staff to raise concerns about malpractice. Can also be found on this webpage .

11	Policy on Student Harassment and Sexual or Physical Misconduct	Policy on Student Harassment and Sexual or Physical Misconduct Procedures for Dealing with Harassment
12	UEA Code of Practice for Staff: Personal relationships between staff and students	UEA Code of Practice for Staff: Personal relationships between staff and students
13	Near relative concessions process on being offered a place at UEA	Policy can be found within the Admissions Policy webpage.

Governance	Detail
Policy owner	Executive Team
Underlying University strategy or plan	
Underlying legislation	The Charity Commission has guidance for charity trustees, in our case UEA Council members, on conflict of interests. https://www.gov.uk/guidance/managing-conflicts-of-interest-in-a-charity The Office for Students (OfS) expects Trustees to be fit and proper persons and OfS Condition E1 requires that our governing documents uphold the public interest governance principles that are applicable to us as a University.
Recommended by	<i>Director of Governance and Assurance, Dr Andrea Blanchflower and University Secretary, Ian Callaghan</i>
Approved by	Executive Team (22.2.22) and Council (14.3.22) COU21D061
Effective working date	April 2022
Review date(s)	None – new in 2022

Future review date	Review window 2025/26 - 2026/27
Supporting regulations	None
Supporting operational processes	Operational guidance
Supporting guidance for those running the process	None
Supporting guidance for this using the process	Guidance for managers – June 2022 (author Director of Governance and Assurance, Dr Andrea Blanchflower) Website “ How to declare a Conflict of Interest ” ((author Director of Governance and Assurance, Dr Andrea Blanchflower) – last updated June 2022
Enquires	Queries on this policy should be addressed to: Director of Governance and Assurance, Dr Andrea Blanchflower
Key web search terms	Conflict of interest, declarations of interest, register of interests