

REGISTER OF INTERESTS POLICY

1. Introduction

- 1.1 Central to the proper conduct of public business is the need for University staff to follow the seven principles of public life as set out by the Committee on Standards of Public Life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership (the Nolan Committee). Failure to do so may provide a risk to the reputation of the University, or leave members of staff open to suspicion of impropriety in their conduct of business.
- 1.2 All members of staff should ensure that they act impartially in accordance with the principles of public life. Good practice requires that any member of staff who has a material interest, either directly or through a partner, spouse or close relative (eg. dependant children), in any University matter to declare that interest.
- 1.3 The purpose of this policy is to set out the principles for minimising and managing potential conflicts of interest and, in so doing, provide protection to the University and its staff. In establishing this policy, the University aims to achieve the effective management of conflicts of interest without over-prescriptive regulation.

2. Policy Objectives

To ensure best practice by:

- (i) ensuring those individuals covered by the policy make decisions free from bias;
- (ii) guarding against conflicts of interest that may arise as a result of 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.

3. Individuals covered by the Policy

This policy extends to all members of University staff and, in particular, those involved in the purchase of goods or services, or advising and making judgements/decisions on behalf of the University. The policy also extends to members of Senate, the Governing Body, and to members of associated core committees.

4. Roles and Responsibility

- 4.1 It is the responsibility of the Vice-Chancellor, Pro-Vice-Chancellors, Deans, Heads of School, Registrar and Chief Operating Officer, and Directors to ensure their staff are aware of, and comply with, this policy.
- 4.2 It is the responsibility of line managers to be aware of, and to act in accordance with, this policy where a potential conflict of interest arises.
- 4.3 It is the responsibility of individual members of staff, and co-opted members of the University, to ensure they declare any potential conflict of interest in accordance with the terms of this policy.

- 4.4 It is the responsibility of the Audit Committee to periodically review the Register of Interests.
5. How to Declare Interests
- 5.1 On appointment to Queen's, either as a member of staff or as a lay member, individuals will be asked to read and comply with this policy.
- 5.2 Formal declarations, requiring the completion of a Register of Interests Declaration Form, included as Annex A, are required in respect of:
- (i) Members of Senate, including lay officers and other members.
 - (ii) Co-opted members of other core committees, eg. Planning and Finance Committee, Investment Committee.
 - (iii) University Senior Management, i.e. the Vice-Chancellor, Pro-Vice-Chancellors, Deans, the Registrar and Chief Operating Officer, Heads of School and Directors.
 - (iv) Relevant staff in the Finance Directorate (Purchasing), the Estates Directorate and the Students' Union who are directly involved in the management and operation of the University's approved purchasing regulations.
- 5.3 Any changes to the circumstances of staff or lay members, including new interests, should be declared and updated at the earliest opportunity.
- 5.4 Other members of staff, who, in their normal role, are required to requisition and/or purchase goods or services on behalf of the University, or are involved in associated decision making processes, are required to declare, at point of order/transaction, whether they have a related interest, by confirming, on standard *pro formas*, that:
- "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."*
- 5.5 Guidance contained in the remainder of this document should be followed in relation to all instances where, and when, a declaration requires to be made.
6. Declaration of Interests
- 6.1 Individuals involved in the University's business are required to declare any professional, commercial, academic, or other interest that may conflict with the interests of the University.
- 6.2 In addition, matters which might be seen by reasonable members of the public to influence or bias judgement, when discussing or reaching decisions, should also be declared.
- 6.3 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 possibly 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 possibly 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 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 5% 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.
- 6.4 If in doubt, individuals should discuss the matter with their line manager for clarification or with the Chair of the meeting.
7. Declaration of Interests at Meetings
- 7.1 During the course of a meeting, members need to be vigilant raising any conflict of interest, as soon as they become aware of it, so that appropriate action can be taken.
- 7.2 The Chair will advise on the action required to resolve any conflict of interest which becomes apparent at a meeting. Depending on the nature of the interest, the Chairman will decide whether the individual should leave the room for a particular item or remain, but take no part in the discussion.
- 7.3 Actions taken in relation to declarations of interests will be recorded in the minutes.
8. Resolution of Declaration of Interests
- 8.1 Potential conflicts of interest at meetings will normally be resolved through the individual concerned not participating in the relevant discussions, or any subsequent discussions, and having restricted access to information.
- 8.2 An interest declared in respect of any element of purchasing goods or services, or making judgements/decisions on behalf of the University, should be brought to the attention of the appropriate line manager and, in turn, to the Head of School or Director. Any individual, with declared interest, should be excluded from such decisions and advised accordingly.
9. Updating the Register of Interests
- 9.1 Members of staff will be able to update formal declarations contained in the Register of Interests through Queen's Online *.
- 9.2 Members of Senate will also be enabled to use this system, as well as having access to a paper record for updating at each meeting of Senate.

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- 9.3 The Register of Interests must be updated on an annual basis, or more frequently depending on individual circumstances.
- 9.4 All information provided through the on-line site, will be held on a central database to facilitate regular monitoring and update.

First Approved: November 2006
Revised: October 2007
Final Approval: November 2007

THE QUEEN'S UNIVERSITY OF BELFAST

Register of Interests: Declaration by Member of Staff

Surname _____ Title _____

Forename(s) _____

Department _____

Job Title _____

Date of Appointment to Current Position _____

Date of Appointment to Queen's (if different) _____

Please note:

Any interest, financial or otherwise, which, if publicly known, could be perceived as being likely to interfere with the exercise of independent judgement should be disclosed to the University. **Any member of Senate, the Governing body, the University's core committee structure or member of staff who has a material interest, either directly or through a partner, spouse or close relative (e.g. dependant children), in any University matter should declare an interest.** Such declarations should describe the interest clearly and state whether it carries either direct or indirect financial interests.

Relevant interests in this context are as follows:

- Directorships, including executive and non-executive directorships of public or private companies likely or possibly seeking to do business with the University or with any of its associated or related companies.
- Employment by public or private companies likely or possibly seeking to do business with the University or with any of its associated or related companies.
- Significant shareholdings in public or private companies 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 5% or more of the issued capital).
- Remunerated or honorary positions and other connections with other educational institutions (including universities, further education colleges and/or schools), which may give rise to a conflict of interest.
- Public appointments (paid or unpaid) or election to office which may give rise to a conflict of interest.

THE QUEEN'S UNIVERSITY OF BELFAST

Register of Interests: Declaration Form

NB: Where appropriate, also include duration of appointment(s) and details of any remuneration received.

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 relevant details in the space below:

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 relevant details in the space below:

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 5% or more of the issued capital.

Please tick:

Yes ☐ No ☐

If **yes**, please provide 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 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 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), which may give rise to a conflict of interest.
Please tick:

Yes ☐ No ☐

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

7. Do you hold any public appointments (paid or unpaid) or elected office, which may give rise to a conflict of interest.
Please tick:

Yes ☐ No ☐

If **yes**, please provide 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, which may give rise to a conflict of interest.
Please tick:

Yes ☐ No ☐

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

I confirm that I have read, understood and complied with the University's 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 _____

After completion, please return the form to the Registrar and Chief Operating Officer, Lanyon Building, Queen's University Belfast, BT7 1NN