



**UNIVERSITY
OF LONDON**

Conflict of Interest Policy and Disclosure Procedures

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 1.0.2024</i>
Date of approval	<i>26/03/2024</i>
Formal Review cycle	<i>Every three years or sooner if required.</i>
Review date	<i>12/03/2026</i>

Conflict of Interest Policy and Disclosure Procedures

Those working for or on behalf of the University of London have a responsibility to declare any external interests, to recognise perceived, potential or actual conflicts of interest when they engage in University business, and to disclose any such conflicts in line with this Policy and its procedures.

This policy and set of procedures is designed to ensure that where any conflicts may arise, they will be managed in an appropriate manner such that University decision-making is not unduly impacted by the private interests of any individual.

The University has a global reputation and influence and encourages its members to engage in a wide variety of external activities. Many of its members can therefore expect to hold legitimate external interests but which may occasionally give rise to conflicts. This policy and set of procedures is designed to provide a framework allowing those experiencing conflicts of interest to place themselves beyond suspicion.

If you are working for or on behalf of the University and you need to declare a conflict of interest, you must read this policy and follow the procedures outlined in this document.

Contents

1. Policy statement
2. Who does this policy and procedure apply to?
3. What is a conflict of interest?
4. What are my responsibilities?
5. How and when should you declare an interest or make a disclosure.
6. How are conflicts of interest managed?

Annex

- A. The Annual Register of Interests

The University of London's Conflict of Interest Policy and Disclosure Procedures

1. Policy statement

1.1 Individuals working for or on behalf of the University of London ('the University') have a responsibility to declare any external interests, to recognise perceived, potential or actual conflicts of interest when they engage in University business, and to disclose any such conflicts in line with University procedure. This policy and set of procedures details how conflicts of interests can be disclosed and how they will be managed in an appropriate manner such that University decision-making is not unduly impacted by the private interests of any individual.

1.2 The purpose of this Policy and Procedure is:

- x to enable all those working for or on behalf of the University to understand their responsibilities to identify and disclose any perceived, potential or actual conflicts of interest in order that they can be appropriately managed;
- x to ensure that those working for or on behalf of the University

1.3 Compliance with this Conflict of Interest policy is compulsory for all those working for or on behalf of the University. Failure to adhere to the policy may constitute a disciplinary offence.

1.4 This policy and procedure forms part of the University's broad framework of policies and guidance documents. The University of London's Conflicts of Interest Policy and Disclosure Procedure should be read in conjunction with related University [core policies](#) and guidance documents which by necessity also refer to Conflicts of Interest and which include:

- x *Policy on Acceptance of Gifts and Donations*

- x *Bribery and Corruption Policy and Procedure*

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

4. What are my responsibilities?

Members of staff of the University

- 4.1 As a member of staff, you have a personal responsibility to comply with this policy.
- 4.2 Furthermore, as a member of staff, you must:
- x act with integrity and in a transparent way, including to identify any conflicts of interest arising in the course of your work at the earliest reasonable opportunity;
 - x declare any interests arising in accordance with the procedures outlined in Section 5, 'How and when to declare an interest or make a disclosure';
 - x not use for personal gain any confidential information obtained through your involvement with the University;
 - x be mindful of the provisions of the Bribery Act 2010 and follow the University's *Bribery Act Policy and Procedure*;
 - x not give or receive gifts which would create a conflict of interest, and follow the University's *Policy on Acceptance of Gifts and Donations*.
- 4.3 If you are involved in a procurement exercise, you should declare any conflict of interest before tenders are issued.
- 4.4 If you are involved in conducting research, you should maintain the highest standards of research integrity, and follow the University's *Research Ethics Policy and Procedure*. The potential for personal gain must not, nor appear to, jeopardise the integrity of research activities whether in relation to the choice of research area, research design, or the interpretation or the publishing/reporting of findings.
- 4.5 If you are involved in educating, training, supervising or directing the work of students, you should ensure that no illegitimate interests influence or may appear to influence your approach to such activity.
- 4.6 Where relationships occur between members of staff, both individuals must deal appropriately with any potential conflicts of interest, and ensure that personal relationships do not advantage or disadvantage any member of staff or other individuals (such as job applicants or service providers). If a member of staff is involved in a close or familial relationship with an applicant for a job, they must not be involved in the selection process, and if appointed the successful candidate cannot be placed in a direct line management relationship with the existing staff member.
- 4.7 If you have a concern about what you in good faith believe to be a conflict of another member of staff of the University, then you should raise this directly with the University Secretary (or an officer delegated by the University Secretary) or under the University's *Public Interest Disclosure (Whistleblowing) Policy and Procedure*.

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.