



STRANMILLIS UNIVERSITY COLLEGE
A College of Queen's University Belfast

REGISTER OF INTERESTS POLICY

1. Introduction

- 1.1 Central to the proper conduct of the public business is the need for University College 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 College or leave members of staff open to suspicion of impropriety in their conduct of business.
- 1.2 All members of staff involved in the purchase of goods or services, or who provide advice, or make judgements on behalf of the University College, should ensure that they act impartially in accordance with the principles of public life. Good practice requires any member of staff who has a material interest, either directly or through a partner, spouse or close relative (e.g. brother, sister, children etc.), in any University College 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 College and its staff. In establishing this policy, the University College aims to achieve the effective management of conflicts of interest without over-prescriptive regulation.
- 1.4 The Policy will be included in all Staff Handbooks.

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 College, and those individuals covered by the policy, against impropriety, or the appearance of impropriety, including reputational risk.

3. **Individuals covered by the Policy**

All members of staff involved in the purchase of goods or services, or advising and making judgements/decisions on behalf of the University College. Since this cannot be fully anticipated in advance, all relevant members of staff will be required to complete a Register of Interests form and regularly update it. The conduct of all members of staff must reflect the Nolan principles set out in 1.1 above.

4. **Roles and Responsibility**

- 4.1 It is the responsibility of the Principal, Vice-Principals and Heads of Academic and Support units to ensure their staff are aware of, and comply with, this policy.
- 4.2 The Vice Principal (Corporate Services) will be responsible for the actual operation of the policy and will maintain and update the Register of Interests.
- 4.3 It is the responsibility of the Human Resources Department to ensure all new members of staff are provided with this policy and that the Register of Interests form is completed on appointment.
- 4.4 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.
- 4.5 It is the responsibility of individual members of staff to ensure they declare any potential conflict of interest. Such declarations should describe the interest clearly and state whether it carries, either directly or indirectly, financial interests; such declarations should be updated on a regular basis.
- 4.6 It is the responsibility of the University College Audit Committee to periodically review the Register of Interests.

5. **How to Declare Interests**

- 5.1 On appointment to Stranmillis, as a member of staff, individuals will be asked to read and comply with this policy and complete a Register of Interests form, included as Annex A.
- 5.2 Existing staff will be brought within the policy on a prioritised basis.
- 5.3 Any changes to the circumstances of staff, including new interests, should be declared at the earliest opportunity to the Vice Principal (Corporate Services).
- 5.4 Declarations may also need to be made during meetings and this is covered in detail in Section 7.

6. **Declaration of Interests**

- 6.1 Individuals involved in the University College's business are required to declare any private, professional, political, commercial, academic, or other interest that may conflict with the interests of the University College.
- 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 Within the purchasing process, the purchase requisition (used to generate a purchase order) will contain a declaration placed under the authorised signatory's signature "I have no related interest in this requisition as outlined in the University College's Regulations, Guidelines and Procedures for the Procurement of Goods and Services".
- 6.4 Only current interests need to be declared but it is possible that, on occasions, a past interest will, or could, influence present behaviour, in which case such an interest also needs to be declared.
- 6.5 It is impossible to describe a comprehensive set of rules on interests. Individuals are best placed to know their responsibilities within the University College 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 College.
 - (b) Employment by public or private companies likely, or possibly seeking, to do business with the University College.
 - (c) Significant shareholdings in public or private companies likely, or possibly seeking, to do business with the University College. (N.B.: 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.
- 6.6 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 in 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 Chair 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 declaration 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 College, should be highlighted to the appropriate line manager and in turn to the relevant Vice Principal. The issue should be fully considered and the member of staff advised accordingly; someone with an interest should be excluded from such decisions.

9. Updating the Register of Interests

9.1 Members of staff will be able to update the Register of Interests through the Vice Principal (Corporate Services).

9.2 The Register of Interests must be updated on an annual basis, or more frequently depending on individual circumstances.



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Register of Interests: Declaration by Member of Staff

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 College?

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 College?

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 College?

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 College?

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 College?

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 College'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 Vice Principal (Corporate Services).