



CONFLICT OF INTEREST POLICY – GUIDANCE NOTE FOR MANAGERS

Introduction

A revised Policy on Conflict of Interest was approved by Court in March 2010. The Policy requires all new employees (regardless of grade or post) to sign a declaration form to declare any potential conflict of interest.

The Policy also incorporates agreement to abide by University regulations on Information Security and Confidentiality and it is therefore essential that employees have read and understood the policy and that records are retained to that effect.

The declaration form signed by the employee must also be authorised by the Head of School/Section and the Director of Human Resources.

A register and file of all completed forms will be held securely in the HR Offices.

This Guidance Note sets out the process by which Conflict of Interest Declaration Forms for new employees are distributed and stored; the process of carrying out annual checks for all staff and the responsibilities of staff and managers in supporting this process.

Prior to New Employee Start Date

The HR department will send out a summary of the Policy and the Declaration Form with the offer of employment and other pre-employment information. The employee will be asked to bring the signed copy of the Declaration Form with them on their first day.

Where an existing employee changes role, whether via the recruitment and selection process or otherwise, s/he will be required to complete and submit another Declaration Form.

First Week of Employee Starting (either new to the University or in the new role)

The Line Manager or member of staff responsible for local induction for the employee should ensure the form has been completed and then (if s/he is not the Head of School/Section) pass the form onto the Head of School/Section for review and approval.

The Head of School/Section, having reviewed and approved the form, then sends the form to the PA to the Director of Human Resources for review and approval. The Conflict of Interest Policy sets out full details of the review process in Section 11.

Potential Change of Conflict of Interest

The Policy also requires that employees complete a separate Conflict of Interest Declaration should their circumstances change during the year. In such cases, the same process should be followed, in that the form should be reviewed and approved by the Head of School and forwarded to the PA to the Director of Human Resources.

Annual Checks on all Staff

The Policy also requires an annual check to be carried out on all staff. The process should largely mirror that carried out for new employees and is summarised below:

1. In November each year, the HR team will email Heads a staffing list for their School/Section together with this Guidance Note, links to the Policy and Declaration Form and a deadline by which the exercise must be completed
2. Heads will be required to disseminate the information to all staff via their departmental heads so that each member of staff is able to access, either electronically or through provision of a hard copy, the Policy and Declaration Form
3. Nil Returns are required to be submitted (i.e. if there are no conflicts to declare or the employee's circumstances have not changed since the last declaration made).
4. The Line Manager should ensure the form has been completed and then (if s/he is not the Head of School/Section) pass the form onto the Head of School/Section for review and approval.
5. The Head of School/Section, having reviewed and approved the form, then sends the form to the PA to the Director of Human Resources for review and approval
6. HR will write to employees known to be on long term absence, e.g. sickness, maternity, sabbatical etc but the forms will be forwarded to Heads to review and approve.

Storing and Monitoring Forms

The HR department will develop and maintain, in a secure environment:

1. A log of all forms issued and the date the completed forms were approved and returned
2. A register of declared conflicts of interest
3. Copies of all the forms
4. Once the annual check has been carried out, forms from previous years will be destroyed in a secure environment

On a regular basis, the log will be checked and any forms that have not been returned will be pursued via the Head of School

Queries about potential Conflicts of Interest

If any member of staff is unclear as to whether s/he has a conflict of interest, s/he should declare it on the form.

Human Resources
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