



CONFLICTS OF INTEREST POLICY

1. INTRODUCTION

This document sets out the University's Policy on the management of conflicts of interest. The Policy is supported by, and therefore should be read in conjunction with, the Conflicts of Interest Procedure and Guidelines which include practical advice to University staff and managers on how potential or actual conflicts of interest should be managed. This Policy supports Keele University's Financial Regulations.

1.1 Purpose

The purpose of this Policy is to ensure that University staff:

- understand the standards of behaviour expected of them, which are reflected in the seven Nolan Principles of Public Life: Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership;
- recognise conflicts of interest, understanding that they take a variety of forms that may not always be obvious;
- are aware of the need to avoid putting themselves in a position where their duty to the University and their private interests might conflict;
- are transparent about external interests, ensuring that these are disclosed to the University, and that that disclosure is kept up to date; engage constructively with managers where conflicts need to be resolved.

1.2 Scope

It is a condition of employment or association that University staff must comply with the requirements of this Policy. This Policy applies to all staff and also Honorary, Visiting and Emeritus titleholders (together referred to as "University staff" within this Policy). There is a separate procedure in place to assess and manage any potential conflicts of interest in relation to Council members (see Annex B of the Conflicts of Interest Procedure and Guidelines).

2. POLICY

- 2.1 The University recognises that some members of staff engage in private or freelance work outside their roles at the University, have external interests in the public or private sectors (for example non-executive directorships) or other external professional or business interests. University staff engaging in external consultancy and other activities for which they receive payment are also subject to the University's Consultancy and Contract Research Policy and Procedure.
- 2.2 These activities carry many advantages, including providing an additional source of research funding and insights into commercial and societal needs, but they may also have the potential for diverting staff from their primary function and educational and research missions. For example, conflicts of interest can arise when the interests of a commercial venture, from which a member of University staff derives direct benefit, differ from the interests and primary obligations of the University as a whole. The University believes it to be essential that its staff manage activities to avoid such conflicts, and to be seen to do so.

3. DISCLOSURE OF INTERESTS

- 3.1 The full prior disclosure of interests is clearly an important mechanism for the management of any potential or actual conflict of interest.
- 3.2 The accompanying Conflicts of Interest Procedure and Guidelines set out details of the procedures and provide guidelines for many of the situations in which potential conflicts of interest may occur together with advice on how to manage them.
- 3.3 If a member of University Staff fails to disclose an actual or potential conflict of interest in accordance with this Policy or related Procedure, this may be considered a disciplinary matter.
- 3.4 New members of staff and Honorary, Visiting and Emeritus Titleholders will be required to disclose any conflicts of interests in accordance with this Policy and related Procedure on appointment. Members of staff must also ensure they review and update their conflict of interest disclosure if circumstances should change at any time, or upon the request of the University, as detailed in section 4.1 below.
- 3.5 The University will not use the information provided under this Policy or related Procedure for any purpose other than to manage any potential or actual conflicts of interest or commitment, subject to the University retaining the right to use any information provided under this Policy in accordance with the

University's Disciplinary Procedures where a disciplinary matter arises. The University will also ensure that personal information provided by University staff is processed in accordance with data protection legislation.

4. ROLES AND RESPONSIBILITIES

4.1 University Staff:

4.1.1 All staff, including new staff joining the University and staff whose potential conflicts of interest alter, or role responsibilities change, are responsible for:

- a) Disclosing and discussing their work-related actual or potential conflicts of interest as outlined as soon as they become aware of a new interest.
- b) Completing the appropriate Disclosure form (Col1 or Col2) as soon as potential conflicts change
- c) Completing the appropriate Disclosure form (Col 1 and Col2) as soon as directed by the University.
- d) Adhering to any actions agreed with respect to managing a conflict of interest.

4.1.2 Any staff member who has a clear and substantial interest in a matter which they are involved in during the course of their work must declare that interest to their line manager immediately and must also declare that interest at any meeting where the matter is being discussed, regardless of whether that interest has already been declared through the Conflicts of Interest process.

4.2 Heads of School/ Professional Service Area

4.2.1 Heads of School/ Professional Service Area are responsible for:

- a) Ensuring that all staff working for or within the University within their area of responsibility are aware of this Policy and the requirements set out within the Conflicts of Interest Procedure and Guidelines.
- b) Leading on the implementation of this Policy and related Conflicts of Interest Procedure and Guidelines and supporting in the creation of an environment of declaration.
- c) Receiving disclosures of interest ensuring that they are reviewed and addressed immediately in accordance with this Policy and related procedure.

4.3 Deans and Directors (and COO, DVC & VC where applicable)

4.3.1 Deans, Directors, COO, DVC and VC are responsible for:

- a) Ensuring that all direct reports are aware of this Policy and its requirements.

- b) Identifying roles within their area of responsibility who are required to complete a disclosure of interest on a periodic basis and ensure this is clearly documented and communicated to their direct reports as appropriate.
- c) Leading on the implementation of this Policy and related Conflicts of Interest Procedure and Guidelines and supporting in the creation of an environment of declaration
- d) Receiving disclosures of interest ensuring that they are reviewed and addressed immediately in accordance with this Policy and related procedure.

4.4 The Secretary to Council has day-to-day responsibility for this Policy, and shall raise awareness to ensure that all managers and other staff who may manage or declare actual or potential conflicts of interest under this Policy undertake regular and appropriate training. Any comments, suggestions or queries relating to this Policy should be addressed to the Secretary to Council in the first instance.

4.5 All University staff are responsible for the success of this Policy and should ensure that they use it to manage or declare actual or potential conflicts of interest in accordance with its provisions.

5. RELATED POLICIES AND PROCEDURES

5.1 Where potential conflicts of interest relate to external consultancy or contract research, this Policy should be read in conjunction with the External Consultancy and Contract Research Policy and Procedures.

5.2 This Policy should also be read in conjunction with:

- Conflicts of Interest Procedure and Guidelines
- Intellectual Property Management Code of Practice
- Consultancy and Contract Research Policy and Procedures
- Personal Relationships at Work Policy and Professional Guidance
- Disciplinary and Appeals Procedure (Staff)
- Disciplinary and Appeals Procedure for Academic Staff
- Anti-bribery Policy
- Gifts and Hospitality Policy
- Procurement Procedure
- Research Integrity Policy
- Data Protection Policy
- Financial Regulations

6. REVIEW, APPROVAL & PUBLICATION

- 6.1 This Policy shall be reviewed at least every 3 years, alongside the Conflicts of Interest Procedure and Guidelines. Any proposed amendments and future versions of the Policy or Procedure will be authorised in line with the University's Policy Framework, following consultation with key stakeholders and the endorsement of the University Executive Committee. Any significant changes will be subject to consultation with affected staff.
- 6.2 The Nominations & Governance Committee has responsibility to monitor the operation of the Conflicts of Interest Policy, including an annual report on declarations of interest and the fit and proper person declarations. In some instances, matters relating to conflicts of interest may be referred to the Audit & Risk Committee.
- 6.3 A copy of this and related policies and procedures can be located on the University's Policy Zone.

7. DOCUMENT CONTROL INFORMATION

Document Name	Conflicts of Interest Policy
Owner	Secretary to Council
Version Number	2.0
Equality Analysis Form Submission Date	[Date form submitted]
Approval Date	04 July 2024
Approved By	Council
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Related University Policy Documents	<ul style="list-style-type: none"> • Conflicts of Interest Procedure and Guidelines • Intellectual Property Management Code of Practice • Consultancy and Contract Research Policy and Procedures • Personal Relationships at Work Policy and Professional Guidance • Disciplinary and Appeals Procedure (Staff) • Disciplinary and Appeals Procedure for Academic Staff • Anti-bribery Policy • Gifts and Hospitality Policy • Procurement Procedure • Research Integrity Policy

	<ul style="list-style-type: none">• Data Protection Policy• Financial Regulations
<i>For Office Use – Keywords for search function</i>	