

Conflict and Declaration of Interest Policy

The University seeks to avoid actual and potential conflicts of interest where possible. We aim to act honestly, ethically and transparently. We seek declarations of both actual and perceived conflicts of interest and take appropriate action to manage the conflict.

All staff and students should recognise activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided.

Declarations of interests are invited from all sections of the University community although, for practical purposes, the scope of the policy is to be restricted to members of Council, salaried staff and students conducting research. Staff under a duty to make an annual declaration will be contacted directly. However, all staff and students, regardless of position or seniority, are asked to consider whether they have a conflicts of interest, actual or possible, that may need to be disclosed.

Guidance

The Conflict of Interests Declaration form is available at the end of this policy. All declarations are kept on a register maintained in the Governance and Secretariat Office [GLASS – Eastern Gateway Building]. The information is strictly confidential with access granted only at the discretion of the Secretary to Council to persons with reasonable grounds to inspect declarations of conflict of interest, such as the internal and external auditors.

Relevant interests are any pecuniary, family [see notes in the policy accessed through the link above] or other personal interest which might be pertinent to the conduct of the University's affairs including the work of Council. This may include:

Paid employment

This includes self-employment and offices held.

Trustee benefits

Trustee benefit is any instance where money or other property goods or services which have monetary value are received by the trustee [Council Member] from the charity [the University]. The law says that trustees cannot receive a benefit from their charity unless they have an adequate legal authority to do so. This does not include:

- i. Reasonable expenses that Council Members are entitled to claim;
- ii. Remuneration and salary-related benefits that are provided for in the employment contracts of members of staff who are also Council Members.

Directorships

All paid directorships and unpaid directorships should be declared.

Clients

Other than those identified above, clients to which services are provided (or through his or her employer or company) that arise out of Council membership or University employment should be declared.

Gifts, Hospitality or Services

This includes financial or other material support, benefits or hospitality. Named post-holders and anyone required by the Secretary to Council or Council's Ethics Advisory Committee to make a declaration are asked to register any such gift received personally or by those close to him or her from a source which in any way arises out of membership of Council or University employment. If it is not easy to decide between what is and what is not acceptable in terms of gifts or hospitality, the offer should be declined or advice sought from the Secretary of Council. For the protection of those involved, the Director of Finance will maintain a register of gifts and hospitality received where the value is in excess of £50. Those in receipt of such gifts or hospitality are obliged to notify promptly the Secretary of Council and the Director of Finance.

Details of the Gifts and Hospitality Policy is available through the following link:

<https://www.brunel.ac.uk/about/documents/pdf/Bribery-Act-Gifts-and-Hospitality-Policy.pdf>

Land

Other than a home used solely for personal accommodation, named post-holders and anyone required by the Secretary to Council or Council's Ethical Advisory Committee to make a declaration are asked to register all land and property within a 10-mile radius of University premises.

Shareholdings

Named post-holders and anyone required by the Secretary to Council or Council's Ethical Advisory Committee to make a declaration are asked to register the name of all public and private companies or other bodies in which they or those close to them have a beneficial interest. Shareholdings amounting to less than 5% of the issued share capital, or where the nominal value of the holding is less than £25,000, do not need to be registered.

Other

This is a general section where interests are registered that do not fall into the above categories but which fall into the general purpose of the register. For example, unremunerated interests, positions of authority held or other significant involvement in other organisations, e.g. charitable or political or other educational bodies. It is particularly important for members of the governing body and senior management involved in procurement to disclose interests they have in, or with, any organisation from whom the University procures goods or services.

Where the interest is of relevance to the business of Council or one of its committees, the declaration shall be made as soon as practicable either at the meeting or in advance to the Chair or Secretary of Council.

If you have any doubts as to whether to declare a certain interest or not or have any questions relating to the completion of this questionnaire, please contact the Secretary to Council.

Colleagues should bear in mind that the obligation to declare an interest is a continuing one. Should colleagues realise retrospectively that they have an interest which is connected with a matter that has been considered they should notify the Secretary to Council of that interest at the earliest opportunity.

The Declaration of Interests Form is set out below. If you have any queries, please contact Jilly Court.

Jilly Court

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**Jilly Court
Secretary to Council and Registrar
Revised July 2019**

Declaration of Interests Form

Brunel University London

Declaration of Interests July 2019

Name	
Brunel University London Committee Membership	
Interests Declared	
Paid Employment:	
Directorships:	
Clients:	
Gifts, Hospitality or Services:	
Land:	
Shareholding:	
Others: Including Charitable, Political, Educational, or other affiliations or interests:	
Signed:	Date of Completion: