

## **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.

Full details of the Conflict and Declaration of Interest Policy is available through the following link:

<http://www.brunel.ac.uk/about/administration/policies-and-other-important-documents>

As well as using the advice contained in this document staff may also refer to the University's policy on Gifts and Hospitality set out in the University's Anti-bribery Policy [also available through the above link].

### **Guidance**

Declaration forms for both conflicts of interest and Gifts and Hospitality are available through the above link]. All declarations are kept on a register maintained in the Governance Information and Legal Office [GILO]. 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 postholders 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.

Full details of the Gifts and Hospitality is available through the following link:

<http://www.brunel.ac.uk/about/administration/policies-and-other-important-documents>

### ***Land***

Other than a home used solely for personal accommodation, named postholders 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 postholders 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 following forms are set out below:

-Declaration of Interest Policy Declaration Form

-Gifts and Hospitality Acceptance Form

For 2018 colleagues will be asked to submit the Declaration of Interest Policy Declaration Form by the end of April 2018. If you have any queries about this please contact:

**Jim Benson**

[Jim.benson@brunel.ac.uk](mailto:Jim.benson@brunel.ac.uk)

**Jim Benson**  
**Secretary to Council and University Secretary**  
**Revised 2018**

**Declaration of Interests Form**

**Brunel University London**

**Declaration of Interests March 2018**

<b>Name</b>
<b>Brunel University London Committee Membership</b>
<b>Interests Declared</b>
<b>Paid Employment:</b>
<b>Directorships:</b>
<b>Clients:</b>
<b>Gifts, Hospitality or Services:</b>
<b>Land:</b>
<b>Shareholding:</b>

**Others: Including Charitable, Political, Educational, or other affiliations or interests:**

**Signed:**

**Date of Completion:**

## Hospitality and Gifts

The occasional exchange of business gifts, meals or low level entertainment is a common practice and is meant to create goodwill and enhance relationships. However, if the receipt of business courtesies becomes excessive, it can create a sense of personal obligation on the part of the recipient. Such sense of obligation can interfere with the individual's ability to be impartial in the transaction.

Staff may accept business courtesies, but such courtesies must be modest enough not to interfere with the ethical judgement of the member of staff and must not create an appearance of impropriety. Corporate hospitality and gifts (whether received or provided) must be transparent, auditable and proportionate. Modest gifts and hospitality may be accepted unless an inducement is intended or suspected. The University expects the following procedures to be followed:

- All gifts and hospitality of an estimated value of £50 or more are to be recorded on the **Gift and Hospitality Acceptance Form**
- If it is not possible to value the gift or hospitality received, or if it is unknown, then that information should be declared on the **Gift and Hospitality Acceptance Form**.
- Gift/hospitality declarations need to be referred to the Line Manager of the person in receipt of the gift or hospitality for countersigning [in the case of the Vice Chancellor this shall be the Secretary to Council].
- The Line Manager will send the Gift and Hospitality Acceptance Form to the Secretary to Council who will make a decision as to whether it can be accepted [the Secretary to Council may need to seek the advice of the Director of Finance as to whether the gift or hospitality may be accepted.
- Issues that cannot be resolved by the Director of Finance and the Secretary to Council will be referred to the Ethics Advisory Committee for consideration.
- If it is deemed as unacceptable for the gift/hospitality to be received, but it is not possible for it to be returned, the gift should be put to charitable use.

If a gift or hospitality is not in keeping with circumstances then every effort must be made to refuse the offer without offending the person or organisation making the offer. If the gift cannot be refused it should be declared on return to the University.

Any gift or hospitality received or given must not have any influence or intention to influence the party receiving the gift or hospitality. For guidance as to whether to accept a gift or hospitality, it is generally expected that the frequency and scale of hospitality accepted should not be significantly greater than the University would be likely to provide in return. Colleagues may also wish to note that information on gifts or hospitality may have to be publicly disclosed.

In no circumstances must any gift of money be made or received by an official of the University.

## Review

This policy will be reviewed by the Audit Committee annually, or as and when any legislative changes occur, to ensure compliance with one of the principles of the act.

## Gift and Hospitality Acceptance Form

<b>Name(s) of person(s) to whom gift/hospitality given</b> <i>[ie employee of University/spouse/partner or member of close family of employee]</i>	
<b>College/Department/Institute</b>	
<b>Date gift/hospitality Received</b>	
<b>Organisation/person providing gift/hospitality and their relationship with the University</b>	
<b>Name of event (if applicable)</b>	
<b>Details of gift/hospitality Received</b>	
<b>Purpose of gift/hospitality Received (if known)</b>	
<b>Estimated value (if known)</b>	
<b>Was this gift/hospitality given solely for the named person's use? Y/N</b>	
<b>If 'No' please give further details:</b> <i>e.g. shared with the team etc</i>	
<b>Signed</b>	
<b>Date declaration submitted</b>	
<b>Name of Line Manager</b>	
The Line Manager is asked to countersign this form to confirm that, to the best of his/her knowledge, the information detailed here is accurate	
<b>Countersigned by Line Manager</b>	

- All gifts and hospitality of an estimated value of £50 or more are to be recorded on the proposed declaration form.
- **The Gift and Hospitality Declaration Form needs to be sent to the Secretary to Council for a decision.**
- If it is not possible to value the gift or hospitality received, or if it is unknown, then a declaration should be made.
- Issues that cannot be resolved by the Secretary to Council and the Director of Finance will be referred to the Ethics Advisory Committee for consideration.
- If it is deemed as unacceptable for the gift/hospitality to be received, but it is not possible for it to be returned, the gift should be put to charitable use.