

## Declaration of Interests

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<b>Key terms</b>	Research/External Work
<b>Purpose</b>	Providing expectations and processes for individuals to reflect on their interests, and identify, declare and mitigate any potential conflicts of interest if and when they arise: to avoid compromising - or the perception of compromising - impartiality in decision-making.

<b>Version number</b>	<b>Purpose / changes</b>	<b>Document status</b>	<b>Author of changes, role and school / unit</b>	<b>Date</b>
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# Policy Statement

1. This policy aims to embed the principles of behaviour arising from the

# Definitions

11. Potential conflict of interest: a

- b. For previously encountered situations: any potential conflict of interest that arises as the situation develops; and a change in status of any interest that was previously determined to constitute an actual or perceived conflict of interest

university duties, or a development in a situation.

22. A declaration must be made at the point the potential conflict of interest arises or changes as detailed in paragraph 21.

## **Procedure for mitigating actual or perceived conflicts of interest**

23. Some potential conflicts of interest may be dealt with quickly and simply, e.g., an individual informing the convenor of a recruitment panel that a family member has applied for the job and that this is a potential conflict of interest, this being categorised by the convenor as an actual conflict of interest, and this conflict of interest being mitigated by the convenor through excusing the individual from the selection process. For further examples, see Appendix 1. For conflicts of interest in committees/meetings, see paragraphs 33 to 35.

24. For potential conflicts of interest that require more careful consideration, the individual should write to their Head of School/Unit or senior point of contact within the University briefly detailing the following information:

- a. Nature and details of the potential conflict of interest
- b. Description of the parties involved
- c. Any potential financial interests and rewards
- d. Any potential violation of legal requirements
- e. Other relevant information necessary to make an evaluation.

A template for disclosing a declaration of interest is included at Appendix 2. If required, the Head of School/Unit/senior point of contact should then contact the individual to gather any further information relevant for the assessment. Individuals can seek help and advice from relevant individuals in RIS, HR and Finance, at [interests-advice@st-andrews.ac.uk](mailto:interests-advice@st-andrews.ac.uk).

25. If the Head of School/Unit/senior point of contact determines that there is no actual or perceived conflict of interest, a brief record of the details should be held by the Head of School/Unit/senior contact and sent to the individual.

26. If the Head of School/Unit/senior point of contact determines that there is an actual or perceived conflict of interest, they must determine and document a mitigation plan, and provide a copy to the individual, copying in [interests-advice@st-andrews.ac.uk](mailto:interests-advice@st-andrews.ac.uk). In determining the mitigation plan, the Head of School/Unit/senior point of contact should liaise with the individual, and consider utilising one or more of the following strategies:

- a. Removal of the individual from the situation, activity or conflict
- b. Restricted involvement of the individual in the situation, and documenting appropriately
- c. Requesting involvement from an independent third party to oversee the integrity of part or all of the relevant situation
- d. The individual relinquishing the interest.

27. In undertaking the steps detailed in paragraphs 25 and 26, the Head of School/Unit/senior point of contact can consider the examples provided in Appendix 1 and can seek help and advice from relevant individuals in RIS, HR and Finance, at [interests-advice@st-andrews.ac.uk](mailto:interests-advice@st-andrews.ac.uk). An appropriate member of

- a. The Head of School/Unit/senior point of contact has a potential conflict of interest in the matter
- b. It is a significant or complex conflict of interest (whether actual or perceived) and the Head of School/Unit/senior contact requires help and advice to resolve the matter

28. It is the responsibility of the relevant individuals to adhere to the mitigation plan.

29. See Appendix 1 for more examples of how to mitigate a conflict of interest.

## **Conflicts of interest in committee/meetings**

30. When a potential conflict of interest is declared in a committee/meeting situation relating to a specific item of business, the Chair must determine whether it is an actual or perceived conflict of interest, and must then take one of the following mitigating actions:
- a. Instruct the individual to leave during the discussion and decision-making
  - b. Instruct the individual to stay and participate in the discussion but leave during the decision-making, or stay and abstain from participation in the decision-making
  - c. Allow the individual to stay but not participate in the discussion or decision-making
  - d. Allow the individual to stay and fully participate in the discussion and decision-making.
31. The Chair must determine whether the actual or perceived conflict of interest could be ongoing. If so, based on the details of the conflict of interest, the Chair must decide whether to withhold future papers on the matter from the individual.
32. All
- a. declarations of potential conflicts of interest
  - b. decision to withhold future papers from the individual

## **University Court and its sub-management team**

33. Regular attendees or members of the above groups will be required to declare (and keep up to date) all potential conflicts of interest.
- 34.

## **Appendix 1 Examples of conflicts of interest and how to mitigate them**

An individual is asked to act as a member of a recruitment panel.

At the point of being asked, they know that a [family member/friend/research group member/close research collaborator] intends to apply

They agree to take part, and only once they participate in shortlisting do they see that a [family



Decision of Head of School/Unit/senior point of contact on whether an actual or perceived conflict of interest exists. Please state reasons for decision.

Head of School/Unit/senior point of contact

The Head of School/Unit/senior point of contact should send a copy of their decision to the individual. If an actual or