



UNIVERSITY OF
LINCOLN

CONFLICT OF INTERESTS POLICY

POLICY COVER SHEET

Purpose of Policy:	This policy defines conflicts of interest and provides a framework for recording, reporting and managing such conflicts.
Applicable to:	All University of Lincoln staff, students and governors (including those working on behalf of the University or its subsidiaries).
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Conflict of Interests Policy

1. Introduction

1.1 All University of Lincoln staff, students and governors (including those working on behalf of the University or its subsidiaries) are required to recognise and disclose activities that might give rise to actual or perceived conflicts of interest and to ensure that such conflicts are properly managed or avoided.

1.2 A conflict of interest may arise when the commitments of staff, students and governors to the University compete with their personal interests or commitments to other people or organisations.

1.3 Conflicts of interest which are not effectively managed can damage the University's mission, its public standing and reputation as well as the reputation of the individuals concerned; potentially resulting in legal action, financial loss or disciplinary action. Where conflicts of interest are managed effectively (by adhering to this policy), individuals can usually continue their activities as normal, and avoid placing themselves and the University at risk.

1.4 It is acknowledged that the University is a large and complex organisation and conflicts of interest will likely arise. The intention of this policy is therefore to ensure that all staff, students and governors are provided with the information necessary so that they are aware of the implications of conflicts of interest, can recognise when a potential or real conflict might arise and can manage such conflicts accordingly.

2. Definition

2.1 A conflict of interest is defined as an actual or potential conflict between the commitments and/or responsibilities of an individual in a position of trust or authority, and any other interests the individual may have. This can be best thought of as any circumstance when an individual could be seen to be able to influence or is influencing University business, for potential or actual personal gain (be this financial, not-financial, or both), or seeking such a gain at the University's expense.

2.2 Confidential information obtained via engagement in any University activities must not be used by an individual to whom this policy applies for their own personal gain.

3. Register of Interests

3.1 All governors and members of the Senior Leadership Team are required to provide an annual declaration of their interests and a set of declarations relating to any known relevant transactions over which they may have had influence, breaches of law/regulations and frauds which may impact the University or its subsidiaries. These are recorded and returned using the prescribed form provided by Secretariat. All governors and members of the Senior Leadership Team are required to keep this up to date by declaring any in-year changes by writing to the Deputy University Secretary.

3.2 Only at the discretion of the University Registrar & Secretary (or the Deputy University Secretary in their absence) and only on sufficient grounds will access be granted to persons to inspect individual declarations referred to under 3.1 (i.e. External Auditors).

3.3 The University will make public a register of the declared interests of its governors which includes:

- Existing employment and any previous employment in which individuals continue to have an interest (other than the University of Lincoln);
- Appointments or Partnerships (including voluntary and public) such as directorships, trusteeships, local authority memberships etc. be these paid or unpaid;
- Membership of any professional bodies, trade or other associations, pressure, special interest groups or mutual support organisations;
- Significant or material shareholdings or interests in listed companies ('significant' as meaning 25% or more of the company equity; and 'material' as an investment which makes a personal difference to the circumstances of the owner of the shareholding);
- Investments in unlisted companies, partnerships and other forms of business;

- Gifts or hospitality of a value of more than £25 accepted by the individual in the last 12 months from external bodies or companies in relation to University activities;
- Close family relationships with anyone likely to have a direct or indirect interest in matters concerning the University;
- Any contractual relationship with the University or any of its subsidiaries;
- Any other relevant information not covered by the above.

4. Declaring Interests at Committee

4.1 Members of committees/attendees at meetings, who have a clear conflict of interest in a matter being considered should declare that interest at any and all meetings where the matter is to be discussed, whether or not that interest is already recorded in the University's Register of Interests.

4.2 The member/attendee concerned is expected to withdraw from the meeting during the relevant discussion or decision, at the discretion of the Chair.

4.3 Such a declaration should be recorded in the minutes of the meeting.

5. Managing Other Conflicts of Interest

5.1 Conflicts of interest may arise in a variety of situations; from personal, social, financial or business interests or ethical considerations and could relate to students, staff, applicants (both for admission as a student and for staff roles), alumni, research or other collaborative partners, other organisations, donors or sponsors or suppliers of goods or services (although this list is not exhaustive).

5.2 Further to the above, if an individual perceives a conflict of interest might occur, or is otherwise in any doubt as to whether something constitutes a conflict of interest, then a report should always be made to their Head of School or Department and advice sought from the Secretariat as to how this should be recorded.

5.3 The areas set out in the following sections are not exhaustive but represent other common areas where a conflict of interest might occur. Please note, some links are only accessible to those with University account access.

5.4 Anti-Bribery, Gifts and Hospitality

Please refer to the [Anti-Bribery and Accepting Gifts and Hospitality Policy](#).

5.5 Personal Relationships (Staff and Students)

Please refer to the [University Personal Relationships Policy](#).

5.6 External Examiners

Please refer to the [External Examiners Guidance for Staff \(Taught Provision\)](#).

5.7 Staff Recruitment

Staff recruitment should be undertaken in accordance with the [Recruitment and Selection Policy](#).

5.8 Procurement

The Procurement team is responsible for supporting the University with obtaining supplies, services and works from external suppliers. The University requires that all purchases are made according to its [Procurement Policy](#).

5.9 Consultancy Opportunities and Commercial Interests

Some difficulties may arise when looking to exploit intellectual property or other research and commercialisation opportunities, such as formation of spin-out companies, commercial research or consultancy undertaken whilst at the University. Potential conflicts in regards to such activities, whether or not related to an individual's work with the University, should be disclosed to the Research and Enterprise team via ipcontracts@lincoln.ac.uk so that these can be managed appropriately.