

# Conflicts of Interest Policy

## Policy Statement

1. The University is committed to the highest standards of integrity, transparency, and accountability. In line with the [Nolan Principles of Public Life](#), members must carry out their duties impartially, objectively, and free from personal or institutional bias. Decisions should be transparent, ethical, and compliant with legal and regulatory requirements, maintaining trust and confidence across the University. When assessing a potential conflict of interest, members should also consider how it may be perceived by others.
2. Failure to disclose conflicts of interest can have serious consequences, including reputational damage, diversion of resources from core activities and strategic priorities, as well as potential criminal liability. The existence of an actual, perceived, or potential conflict does not imply wrongdoing, however, any private, personal, or commercial interests that could give rise to a conflict must be identified, disclosed at the earliest opportunity, and appropriately managed.
3. Declaring a conflict of interest does not restrict freedom of speech, but individuals may need to withdraw from related discussions or decisions. See the [Code of Practice on Freedom of Speech](#).

## Purpose

4. The purpose of the Policy is to:
  - (a) procure legal and regulatory compliance;
  - (b) safeguard the integrity of governance, research, and academic activities in line with the Office for Students (OfS) [Public Interest Governance Principles](#), ensuring that decisions are made impartially and in the best interests of the University;
  - (c) reference the procedure for declaring, managing and recording conflicts of interest and enable individuals to recognise where their personal interests may conflict (or be perceived to conflict) with their duties to the University.

## Scope

5. This Policy applies to all University **colleagues**<sup>1</sup>, members of the **governing body**, and **University nominated directors of subsidiary and associated companies**. Where relevant, the also Policy applies to 'associated persons', such as contractors, consultants and external examiners, research students or students who undertake teaching, assessment or supervisory duties on behalf of the University. This Policy applies to all University activities (including those provided on the University's behalf), including overseas operations and partnerships.

---

<sup>1</sup> Including officers, academic and administrative employees (whether permanent, fixed term or temporary), workers, trainees, seconded staff, agency staff, volunteers, interns or any other person working in any context within the University. This includes honorary, external and visiting staff.

## Key Definitions

Term	Definition
<b>Conflicts of interest</b>	<p>A situation where an individual's personal interests could affect or be seen to affect their University duties or influence their judgement.</p> <p>Conflicts of interest may be:</p> <ul style="list-style-type: none"><li>a) financial, non-financial, or both;</li><li>b) actual, potential, or perceived;</li><li>c) direct or indirect, including through a close personal connection.</li></ul> <p>See Appendix A for examples.</p>
<b>Close personal connection</b>	<p>Someone with whom the individual has a personal or business relationship which includes family members, partners, close friends, and personal or business associates.</p>
<b>Declaration</b>	<p>A declaration or disclosure of any interest that could give rise to a conflict of interest.</p>
<b>Register</b>	<p>The University's central record of declared interests. Senior Officer declarations will be published in summary form and shared with external auditors.</p>
<b>Management plan</b>	<p>A written record explaining how a conflict will be managed. This may include actions such as recusal, divestment, or limiting duties, along with responsible owners and review dates. Plans are approved by the appropriate Responsible Officer and recorded in the Register.</p>

## Conflict of Interest Management

6. The following five-step process sets out how conflicts of interest are identified, declared, managed, recorded, and monitored:

### **Step 1: Recognise**

7. Individuals within the scope of this Policy are expected to proactively consider whether their circumstances (see examples at Appendix A) give rise to an actual, potential, or perceived conflict of interest, taking account of whether any competing interests or motivations could, or could reasonably be perceived to, influence their judgement or decision-making. Where a conflict is identified or suspected, it must be declared and appropriately managed in accordance with this Policy. Where there is uncertainty, advice should be sought in the first instance from the relevant Responsible Officer (table 2), with escalation to the [Registrar & Secretary](#) where necessary.
8. Mandatory declaration points are embedded within procurement processes, including pre-market engagement, tender evaluation, and contract award. Staff must declare conflicts of interest status prior to participation in procurement activity. Where a conflict is identified and cannot be appropriately managed, individuals will be reassigned.

### **Step 2: Declare**

9. Where an individual recognises that they have a conflict of interest to declare, they should notify the relevant Responsible Officer:

**Table 2**

Relevant person with a conflict	Responsible Officer	Formal Arrangements
Chair of the Board	A collective decision of the deputy chair and the Vice Chancellor (where appropriate, taking advice from the Registrar & Secretary)	<p><b>Group A:</b> The central Register (open to public inspection) maintained by Registrar &amp; Secretary's Office and Financial Services.</p> <p>Copies provided to Financial Services and External Auditors.</p> <p>Boards will formally record declarations.</p>
Member of other Boards or Committees	Chair of respective Board or Committee	
Vice Chancellor	Chair of the Board of Governors	
<ul style="list-style-type: none"> <li>• Board of Governors</li> <li>• Senior Management Group</li> <li>• Resource Centre Manager<sup>2</sup></li> <li>• University nominated director on subsidiary and associated companies</li> </ul>	Reported to the Registrar & Secretary's Office, and reviewed by the Governance & Nominations Committee	
Member of UET	Vice Chancellor	
Dean/Director of Service	Manager responsible for the member of staff	
"A person acting in relation to the procurement <sup>3</sup> " includes anyone who can influence a procurement decision	Head of Procurement	
Consultants and contractors	Commissioning Manager	<p><b>Group B:</b> Written declaration held by School / Service</p>
Admissions staff where an applicant is known to an individual	Head of Admissions	
Fundraising, sponsorship and donations	External Relations	
Staff engaged in research contracts, external consultancy, or fundraising activities	Director of Research and Knowledge Exchange	
Colleague with responsibility for the award of contracts	Respective School/Service	
Colleague with responsibility for the appointment of agents	Respective School/Service	
Recruitment panels where an applicant is known to an individual	Panel Chair / HR	
Staff (not within any of the above groups) <sup>4</sup>	Dean of School or Director of Service (or equivalent)	

10. External sources of funding and any potential conflict of interest relating to research must be declared during the Research Ethics approval process under the [Research Ethics Policy](#).

<sup>2</sup> Including SBC Managers listed on the Uniorg list

<sup>3</sup> All participants in procurement activities above £30k (inc vat)

<sup>4</sup> 'Colleagues' refers to all individuals working within the University including all levels and grades, officers, employees (whether permanent, fixed term or temporary), workers, trainees, seconded staff, agency staff, volunteers, interns, or any other person working in any context within the University

### **Step 3: Manage**

11. Where a conflict of interest is identified, proportionate action may be required. The Responsible Officer (table 2) will determine and implement appropriate measures, taking account of the individual's role and level of influence over the relevant decision or activity. Mitigation measures may include (but is not limited to):
  - (a) increasing transparency around the conflict, including disclosure of the conflict to relevant partners, sponsors, or third parties;
  - (b) recusal from all or part of an activity or reassignment of duties;
  - (c) not acting as a signatory to a University contract, including purchase requisitions or approvals, where there is a conflict of interest in the other party;
  - (d) exclusion from discussions, voting, or decision-making or referral of decisions to another individual or group;
  - (e) restriction of access to relevant papers and documentation.
12. Where there is uncertainty about appropriate management action, advice can be sought from the [Registrar & Secretary's](#) Office.

### **Step 4: Record**

13. Records of declarations and management actions must be securely stored, access-controlled in line with data protection requirements, auditable, and retained in accordance with the University's [Records Retention Schedules](#).
14. Group A declarations are recorded in the central Register (available on request). Group B declarations are held locally within the relevant School or Professional Service. The Responsible Officer will hold records of management plans within the relevant School or Professional Service.

### **Step 5: Monitor**

15. The Responsible Officer will monitor declared conflicts and review them periodically to ensure mitigation measures remain effective. Records will be updated as required to maintain compliance and transparency. Individuals in Group A will receive an annual prompt to review their declarations and are responsible for updating them when circumstances change.

### **Reporting concerns under the Conflicts of Interest Policy**

16. Failure to declare or deliberate concealment of a conflict may result in disciplinary action up to dismissal. For contractors and associates, this may include termination of contracts or referral to regulators. The University may also report criminal matters and seek legal remedies, including recovery of losses.
17. Concerns should be reported to the line manager and, where appropriate, the Responsible Officer, who may escalate to the [Registrar & Secretary](#). Where within scope, concerns may also be raised under the University's [Whistleblowing Policy](#).

## POLICY IMPLEMENTATION

<b>Publication</b>	Public website
<b>Embedding</b>	The University will ensure that this Policy is effectively communicated and embedded into practice, including integration into local procedures and risk management.
<b>Reporting</b>	<ul style="list-style-type: none"> <li>• Annual reporting to Audit &amp; Risk Committee.</li> <li>• Policy approved by the Audit &amp; Risk Committee.</li> </ul>
<b>Record keeping</b>	Records will be retained in accordance with the University's Records Retention Schedule and relevant data protection requirements.

<b>Policy</b>	<b>Conflicts of Interest Policy</b>			
<b>Organisation</b>	Leeds Beckett University			
<b>Status</b>	<b>Published</b>			
<b>Last review</b>	12-06-2026 [any previous versions are withdrawn]			
<b>Next review</b>	+3 years from last date of approval [06-2029], or sooner following incidents or legal/regulatory changes			
<b>Policy Owner</b>	Registrar & Secretary			
<b>Key Contacts</b>	<a href="#">Registrar &amp; Secretary's Office</a>			
<b>Developed with</b>	Financial Services, HR, Governance, Legal Services			
<b>Target audience</b>	University colleagues, members of the Board of Governors, and University nominated directors of subsidiary and associated companies			
<b>Approved by</b>	Audit & Risk Committee			
<b>Endorsed by</b>	University Executive Committee			
<b>Internal links</b>	<a href="#">Counter Fraud, Anti-Bribery &amp; Corruption Policy</a> ; <a href="#">Financial Regulations</a> and <a href="#">Procurement Procedures</a> – specifically provisions relating to Gifts & Hospitality; <a href="#">Personal Relationships at Work Policy</a> ; <a href="#">Register of Interest – procedures</a> ; <a href="#">Standing Orders</a> ; <a href="#">Whistleblowing ('Public Interest Disclosure') Policy and Procedure</a>			
<b>External links</b>	<a href="#">The Nolan Principles of Public Life</a> ; <a href="#">CUC code of Governance</a> ; <a href="#">Office for Students' Public Interest Governance Principles</a> ; <a href="#">OFS Guidance for managing potential conflicts of interests</a> (2019); <a href="#">Procurement Act 2023; Guidance: Conflicts of Interest</a>			
<b>Appendices</b>	Appendix A - Examples of financial and non-financial interests Appendix B - Responsibilities Appendix C - Related University Procedures			
<b>Version History</b>	<b>Version</b>	<b>Date</b>	<b>Approved by</b>	<b>Summary of changes</b>
<i>[a whole number represents a full review]</i>	1.0	05/02/2021	Governance & Nominations Committee	First publication
	1.1	26/08/2021	N/A	Updated references / links
	2.0	13/10/2023	Governance & Nominations Committee	Framework for managing conflicts
	3.0	12/06/2026	Audit & Risk Committee	Compliance with ECCTA and Procurement Act.

## Appendix A - Examples of financial and non-financial interests

### **Financial conflicts of interest**

Financial conflicts of interest may include, but are not limited to, direct or indirect financial benefit (or perceived benefit) to an individual, or someone with a close personal connection, in relation to:

- payments for services, contracts, discounts, bonuses, or other favourable terms;
- gifts, hospitality, sponsored travel, or other benefits in kind;
- equity, shares, stock options, or ownership in companies;
- intellectual property rights (including patents, copyrights, and royalties);
- research funding, delivery, or related remunerated or honorary roles;
- directorships, advisory roles, spinouts, or other commercial interests;
- family members' financial interests in companies engaging with the University.

The level of financial gain is not determinative.

### **Non-financial conflicts of interest**

Non-financial conflicts of interest may include, but are not limited to, direct or perceived benefit to an individual, or someone with a close personal connection, in relation to:

- personal relationships or external consultancy roles;
- career progression, status, or reputation;
- admissions, education, or assessment decisions;
- research activity (including funding, supervision, collaboration, authorship, or publication decisions);
- committee, panel, or peer review decisions;
- access to privileged information, facilities, or property;
- political, advocacy, or professional activities that could influence University decisions;
- external employment or interests in suppliers, including procurement involvement;
- gifts, hospitality, or other inducements;
- equity, ownership, or leadership roles in spinouts or related companies.

## Appendix B - Responsibilities

Role	Responsibilities
All Staff and Associated Persons	<ul style="list-style-type: none"> <li>act honestly and with integrity;</li> <li>identify and declare conflicts of interest promptly and keep declarations up to date;</li> <li>declare conflicts relevant to meetings and agenda items;</li> <li>comply with this Policy and related procedures (including <a href="#">Financial Regulations</a> and procurement rules and <a href="#">Personal Relationships at Work Policy</a>).</li> <li>report concerns about undeclared conflicts to the Responsible Officer.</li> </ul>
Managers	<ul style="list-style-type: none"> <li>ensure staff awareness of this Policy;</li> <li>provide proportionate supervision and support compliance.</li> </ul>
Procurement, contracts, donations, and sponsorship	<ul style="list-style-type: none"> <li>ensure conflicts are declared and appropriately managed;</li> <li>conduct due diligence in procurement activity;</li> <li>apply relevant Fundraising and Sponsorship policies.</li> </ul>
Deans, Directors, and University Executive Team	<ul style="list-style-type: none"> <li>ensure staff compliance and awareness;</li> <li>maintain records of declarations and management plans (central Register, management plans or local records as appropriate).</li> </ul>
Vice Chancellor	<ul style="list-style-type: none"> <li>ensure regulatory reporting of material adverse events (OfS) in accordance with the <a href="#">Reportable Events Procedure</a>;</li> <li>approve appointments to subsidiaries/associate companies.</li> </ul>
Finance Director / Head of Procurement	<ul style="list-style-type: none"> <li>oversee financial controls, procurement integrity, and related declarations;</li> <li>maintain the gifts and hospitality register (as set out in the <a href="#">Financial Regulations</a>).</li> </ul>
Registrar & Secretary	<ul style="list-style-type: none"> <li>own, maintain, and review this Policy;</li> <li>act as Counter-Fraud Lead and oversee escalated concerns;</li> <li>oversee governance-related declarations and registers;</li> <li>provide assurance reporting to Audit &amp; Risk Committee;</li> <li>maintain Board of Governors gifts and hospitality register.</li> </ul>
Board and Committee Chairs	<ul style="list-style-type: none"> <li>request declarations at meetings;</li> <li>determine how conflicts are managed;</li> <li>ensure declarations and actions are recorded in minutes.</li> </ul>
Board of Governors	<ul style="list-style-type: none"> <li>Ultimately responsible for ensuring the University maintains robust conflict of interest policies and procedures; delegating operational oversight, Policy approval, and assurance reporting to the Audit &amp; Risk Committee.</li> <li>Recognising when they have a conflict of interest and declaring this at the time that the conflict first arises or becomes known in line with this Policy, ensuring information is accurate and kept up to date.</li> <li>Making declarations as relevant to agenda items at meetings.</li> </ul>
Audit & Risk Committee	<ul style="list-style-type: none"> <li>approve this Policy and monitor implementation on behalf of the Board.</li> </ul>
Senior Staff Remuneration Committee	<ul style="list-style-type: none"> <li>oversee external work commitments for senior post holders approved by the Vice Chancellor.</li> </ul>
External Audit	<ul style="list-style-type: none"> <li>review governance, financial reporting, and related-party transactions, including testing conflict declarations where required.</li> </ul>

## Appendix C - Related University Procedures

The following policies and documents complement and support the Conflicts of Interest Policy and should be read in conjunction with it.

1. HR has specific policies that set out the University's approach to:
  - (a) [External Work for Lecturing Employees Policy and Procedure](#) which governs external work for academic staff and requires permission to be obtained from the Dean of School and a written record kept of such requests and their approval.
  - (b) [Personal Relationships at Work Policy](#) which sets out the close personal and intimate relationships which the University does not allow and the process to manage and declare other personal relationships (see the Policy for the definition of what is meant by a 'personal relationship' and for full information). Where a relevant personal relationship is identified, a record of any actions taken to protect everyone's integrity will be kept by HR on file.
2. The University's [Procurement procedures](#) which require colleagues with purchasing authority to declare to the Head of Procurement any personal interest which may impinge or might reasonably be deemed by others to impinge on their impartiality in any matter relating to their duties. The declaration must be recorded and approved before conducting the business. The [Financial Regulations](#) establishes controls over financial transactions, third-party engagements and declaring gifts and hospitality.
3. Any undeclared or unmanaged conflict of interest that results in personal gain, fraud, or bribery may constitute an offence under the University's [Counter Fraud, Anti-Bribery & Corruption Policy](#) and undeclared conflicts of interest may be subject to investigation. The University has a [Fraud and Bribery Response Plan](#) which sets out how and who will be responsible for investigating reported fraud and actions to be taken. It is an offence for members of the University to accept corruptly any gift, hospitality or consideration (or have them given to members of their families) as an inducement or reward for doing, or refraining from doing, anything in an official capacity or showing favour or disfavour to any person in an official capacity. Any gifts or hospitality received, offered or given should be reported (even if refused) and recorded as set out in the [Financial Regulations](#).
4. The [Whistleblowing Policy](#) provides detailed procedures allowing individuals to confidentially report concerns about misconduct, unethical behaviour or regulatory breaches, while ensuring protection against retaliation.
5. The University's [Standing Orders](#) set out the procedures for declaring and managing conflicts of interest in Board and committee meetings, ensuring transparent and impartial governance.
6. The University's [Research Ethics Policy](#) requires researchers to declare and appropriately manage conflicts of interest to ensure that research is conducted with integrity, impartiality, and transparency, safeguarding ethical standards and compliance with regulatory obligations.
7. The University's [Intellectual Property Policy](#) requires staff to declare and manage conflicts of interest to ensure that IP creation, ownership, and commercialisation decisions are transparent, impartial, and compliant with legal and regulatory obligations.
8. The identification and management of conflicts of interest relating to donations and sponsorships will be undertaken in conjunction with the University's [Fundraising and Donations & Sponsorship Policies](#) [link].