

University of York
Policy on declaring interests, managing conflicts of interest, and gifts and hospitality

Purpose	To address the potential for undue influence and/or perceived impropriety when key judgements or decisions are made on the University's behalf. This can arise in relation to an individual's external or personal interests and relationships, and via the exchange of gifts and hospitality.
Aims	<ol style="list-style-type: none"> 1. To promote transparency in the conduct of the University's business; 2. To prevent the misuse of authority and mitigate potential bias in judgement and decision-making; 3. To ensure that the necessary audit trails are in place to protect the good standing of the University and of the individuals associated with it.
Scope	<p>Applies to all those employed by or appointed to act on behalf of the University, and to all activity undertaken under the University's auspices, including in the UK and overseas. This includes:</p> <ul style="list-style-type: none"> ● All full and part-time staff at all levels of responsibility, including those of the University's wholly or majority-owned subsidiary and joint venture companies; ● Directors of companies/joint ventures in which the University has an interest; ● All members of Council and of its committees; ● External examiners, assessors and advisors; ● Those undertaking consultancy work for the University and anyone on a contract for service for the University; ● Students and other workers employed on a casual basis; ● Those associated by way of an honorary affiliation (e.g. emeritus, visiting academics).
Terminology	<p>For the purposes of this policy, the terms below are used as a 'catch-all' in relation to the following:</p> <p>'Staff' – all those employed by or appointed to act on behalf of the University, as listed above.</p> <p>'Line Manager' - a member of Staff's direct report. For the purposes of this policy, lay members of Council and its sub-committees should report to their committee Chair; the Vice-Chancellor to the Chair of Council, and the Chair of Council to the Chancellor in conjunction with the Registrar & Secretary, or the senior independent lay member of Council.</p> <p>'Departments' – academic departments, professional services and wholly or majority-owned subsidiary and joint venture companies.</p> <p>'Heads of Department' - HoDs, HoPs and Directors of subsidiary companies/joint ventures.</p> <p>'University Committees' – UEB, Council and Senate, and all subcommittees of the latter two.</p> <p>'The University' – the University and its wholly or majority-owned subsidiary and joint venture companies.</p>
Definitions	<p>An individual's <u>'interests'</u> are defined as any activity or association which has a potential or actual bearing on matters relating to the business and activity of the University. They include both the direct interests of the person employed by or appointed to act on behalf of the University, and those of their family, partner or spouse and close personal friends, or other internal or external associates. Interests may be financial or non-financial in nature.</p> <ul style="list-style-type: none"> ● A financial interest refers to anything of non-trivial monetary value, including but not limited to: pay, commission, consultancy, equity interest, forgiveness of debt, property, licensing income, honoraria. ● A non-financial interest refers to any benefit or advantage including but not limited to: potential enhancement of an individual's career, education or professional reputation, access to privileged information or facilities and property, Intellectual Property rights. <p>A <u>conflict of interest</u> arises where an individual's interests may interfere, or be perceived to interfere, with their judgement in relation to activity taking place under the University's auspices. This includes both corporate and academic matters. It does not imply an intention to behave improperly, but will need to be managed in order to protect the good standing of the individual and the integrity of the University's activities.</p>

	<p><u>Gifts</u>: a tangible item or other benefit exchanged in the course of University activity or business. Gifts offered may range in value, and may commonly include business and branded stationery, food and beverages, or corporate gifts such as ornamental items.</p> <p><u>Hospitality</u>: offers of refreshment, invitations to events, travel and/or accommodation by reason of or in connection with University activity or business. This includes gifts and/or hospitality offered to an individual’s family members where there is an actual or potential link to University activity or business</p> <p>The following activities are out of scope:</p> <ol style="list-style-type: none"> i. Major and Corporate gifts to the University, which are covered by the University’s Philanthropic Gifts, Grants and Donations Policy and the Philanthropy and Recognition Due Diligence Policy and Process. ii. Payments to volunteers, which are addressed in paragraph 11.17 of the Financial Regulations. iii. Payments to people involved in research and similar studies, which are addressed in paragraph 11.18 of the Financial Regulations. iv. Gifts and hospitality between the University and its staff, hospitality for students and alumni, and expenses for lay members of Council and its committees, all of which are covered under the University’s Travel and Expenses policy. v. Expenses for external examiners and assessors, procedures for which are set out here: https://www.york.ac.uk/staff/teaching/quality-assurance/external-examiners/ (taught programmes) https://www.york.ac.uk/about/departments/support-and-admin/student-services/exams/examiners/expenses/ (research students) vi. Normal courtesies such as refreshments/working lunches and meals/accommodation received as part of training courses or conferences. vii. University merchandise made available to prospective students at Open Days and other events. viii. Personal gifts between colleagues which are not linked to University activity (e.g. birthday, Christmas, leaving presents).
<p>Implementation and oversight</p>	<ol style="list-style-type: none"> 1. It is the fundamental responsibility of the individual to make the necessary declarations, flag up potential conflicts of interest and abide by any agreed actions. 2. Heads of Department are responsible for: <ol style="list-style-type: none"> a. Bringing this policy to the attention of their staff on appointment and to the whole Department on an annual basis b. Leading on implementation of the policy within their Department c. Promoting a culture of reflection and declaration. 3. Annual assurances are required from Heads of Department and secretaries to University Committees that the policy has been fully implemented within their area of responsibility. Outcomes will be reported to UEB, Audit and Risk Committee and Ethics Framework Governance Committee as required. 4. Registers of Interests and Gift/Hospitality Registers must be available for inspection in pursuit of legitimate University business, including internal audit. Declarations of interest for Council and UEB, redacted to protect sensitive information, are made publicly available online. 5. Records relating to handling of conflicts of interest may only be accessed in pursuit of legitimate University business and in line with University GDPR policies. 6. All records relating to this policy must be retained for a minimum of six years.
<p>Advice on this policy</p>	<p>Dr Adam Dawkins, Head of Governance and Assurance / Dr Alice Wakely, Governance & Assurance Office</p>

Approved by EFGC on the recommendation of UEB: 29 July 2020

Review cycle: 3 years

Previous policies superseded by this document:

Declaration of Interests Form and Guidelines (Sept 2018)

Declaration of Interests Form and Guidelines for Council, lay members, UEB and Operations Group (July 2017)

Declaration of Interests: Oversight and Scrutiny (May 2016)

Hospitality and Gifts policy (2017)

Declaration of gifts and hospitality form (Sept 2018)

Introduction

The University's approach to handling potential and actual conflicts of interest has two elements:

1. **An annual 'declaration of interests' exercise** in the interests of transparency, to record current interests which could give rise to potential or actual conflicts of interest. **This is mandatory for all staff involved in significant decision-making on behalf of the University** (see A.2 below), **who should submit their returns to the University's centrally held Register of Interests**. In addition, any other staff who have relevant interests to declare should do so via a locally held departmental register. The University has adopted a proportionate approach, and for this latter group of staff, only those who have interests to declare are expected to submit a return.
2. Procedures to manage and mitigate specific instances of potential or actual conflicts of interest when they arise in the course of University business. All staff are required to identify, declare and seek advice to actively manage any such conflicts of interest on a case by case basis, in accordance with the procedures set out in this Policy, regardless of whether or not an annual declaration form has been completed. This is because transparency by itself is not always sufficient to mitigate potential bias in relation to specific judgements or decisions. In the majority of cases, conflicts of interest can be managed, and proportionate measures put in place to enable activities to continue, protecting the good standing of all involved.

A. Declaration of interests

1. In keeping with its public good purpose, the University values its links with outside bodies and encourages close liaison between its staff and industry, professional bodies, commerce, charities, Government departments and other academic institutions, both within the UK and overseas. In the interests of openness and transparency, and in order to protect the good standing of the University and its staff, the University will maintain a central Register of Interests, managed by the Governance & Assurance Office, using a standard declaration form, to be completed and stored electronically (see [Appendix 1](#)).
2. The University Executive Board (UEB) wishes to take a proportionate and risk-based approach to disclosures and declarations of interests. Accordingly, returns to the central Register are only required from staff who are involved in significant decision-making on behalf of the University. The following groups of staff must complete and submit an annual return to the central Register within one month of the start of the academic year:
 - Heads of Department (Academic and Professional Support) and their senior decision-making teams
 - The Operations Managers
 - Members of University Committees
 - Members of staff who are on the board of directors or who act as company secretary for wholly or majority owned subsidiary companies or joint ventures
 - Staff who in their normal role are involved in negotiating or have a material influence on, or have access to highly sensitive and commercial information (including contracts for goods or services) or partnerships on behalf of the University (e.g. Finance, Procurement, Legal Services, OPPA).

University of York

Policy on declaring interests, managing conflicts of interest, and gifts and hospitality

The University may in due course add other roles to the above list as appropriate. If an individual has nothing to declare, a nil return should be submitted.

- As part of their induction/handover process, new appointments to the above positions must complete a declaration to the central Register, or, where they have already made a return to the central Register for the year in question, update their entry to include their new role.
- In addition to the central University Register, Departments should keep local Registers, using an electronic copy of the University's standard form in Appendix 1, to record annual declarations from any other members of staff who do not fall within the above groups but have interests to declare.
- Staff must ensure that their record is kept up to date and report any substantive additions or alterations promptly to the relevant Register.
- As set out in the table below, senior managers and Committee chairs should maintain oversight of all returns in their area, so that they are aware of the potential for any conflicts of interest and can manage their areas to avoid such situations from the outset. At the point of completing or updating a return, staff must therefore ensure that they have informed the person/people responsible for oversight in their area of any interests which raise concerns, and indicate in the confirmation cell on the return itself that they have done so. The relevant senior managers/Committee chairs or secretaries may request details of all returns from the central Register for their area from the Governance & Assurance Office if they so wish.

Returns	Responsible for oversight
Departmental senior teams / local departmental registers	Heads of Department
Heads of academic departments	Relevant Deans of Faculty
Heads of Support Services	Registrar & Secretary (or his/her delegate)
Directors of University subsidiary companies	University Subsidiaries Management Group
Council, UEB and Senate	Registrar & Secretary, delegated to the Head of Governance & Assurance
Other University Committees	Committee secretaries, liaising with Committee Chairs

B. Managing conflicts of interest

- Where potential or actual conflicts of interest arise in the course of University business, these must be actively managed on a case by case basis according to the procedures set out below in order to protect the good standing of the individual and the integrity of the University's activities. This applies to all staff regardless of whether or not the interest in question has been formally declared in a Register. It is particularly important to address potential or actual conflicts of interest arising from personal relationships, including family, a partner or spouse or close personal friends.
- The University has detailed procedures in place for managing conflicts of interest in certain areas, as set out in the table below.

HR Policy	The Policy on Personal Relationships identifies appropriate behaviour where personal relationships overlap with professional ones, so that members of staff are not open to potential, perceived or actual impropriety, bias, abuse of authority, discrimination, conflict of interest or favouritism, and the safeguarding of students is ensured: https://www.york.ac.uk/admin/hr/policies/hr-procedures/personal-relationships/policy/
------------------	--

University of York
Policy on declaring interests, managing conflicts of interest, and gifts and hospitality

	The Recruitment Policy sets out the procedure to be followed if a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant: https://www.york.ac.uk/admin/hr/policies/recruitment/recruitment-policy/#3
Procurement	Financial Regulations 11.1.2. debar staff from signing or authorising a University Purchase Order or Contract where they also have an interest in the activities of the other party: https://www.york.ac.uk/staff/finance/regulations-and-policies/financial-regulations/#fr11
Research & Enterprise	Code of practice and principles for good ethical governance [currently under review] Policy on work with outside bodies by members of University staff . Addresses conflicts between the University's interests and those of other organisations.
Assessment	The University Guide to Assessment, Standards, Marking and Feedback sets out procedures for: - handling potential conflicts of interest in relation to the assessment of/administering assessment of students (section 4.2) - avoiding conflicts of interest in the appointment of external examiners (section 19.2.b) and handling any conflicts subsequently arising (section 19.4.5.b): https://www.york.ac.uk/staff/teaching/learning-design/assessment/guide/ Further supporting documents: <i>External Examiners for taught programmes:</i> - Nomination process: https://www.york.ac.uk/staff/teaching/quality-assurance/external-examiners-academic-departments/ - Expectations of the Role of External Examiner (available from the Academic Support Office) <i>Examiners for research degrees:</i> - The Policy on Research Degrees: sections 12.12 and 12.13 and the Guidance for the Appointment of External Examiners for Research Degrees (available via the Standing Committee on Assessment) provide guidance on avoiding conflicts of interest in the appointment of external examiners: https://www.york.ac.uk/research/graduate-school/support/policies-documents/research-degree-policy/
External assessors (teaching quality)	UTC guidance on the Role of External Assessors in Periodic Reviews and Other Visits, paragraph 2.5 sets out restrictions placed on the appointment of external assessors to ensure their impartiality: https://www.york.ac.uk/staff/teaching/quality-assurance/periodic-three-year-reviews/external-assessors/ External Assessors for new programme approval are required to satisfy certain criteria in order to assure their independence. See the proformas available via https://www.york.ac.uk/staff/teaching/quality-assurance/approval/#tab-2

3. Procedure for committee or panel meetings where formal decisions are being taken:

- Agendas must include as a standing item the opportunity for members to declare at the start of the meeting any actual or potential conflicts of interest relating to the business to be discussed.
- Any member who has declared an interest may be invited to recuse themselves from any related discussion or decision-making.
- Both of the above steps should be accurately minuted in the official record of the meeting.
- Where conflicts of interest involve the Chair, s/he may nominate another member to chair that particular item in his/her absence.

Where a committee or panel is undertaking business outside the context of a formal meeting, the same principles apply i.e. the interest should be declared; the member should recuse themselves from any related discussion or decision-making; and appropriate records should be kept by the secretary.

4. For other instances where a potential or actual conflict of interest arises, the procedure is as follows:
 - a. Before any further activity of relevance takes place, the issue must be referred to the line manager/ equivalent of the individual concerned (or to the line manager above if the issue also involves the former). Staff are expected to take responsibility for identifying and referring any potential or actual conflicts of interest which concern them, although issues may also be raised by a third party.
 - b. The individual concerned and his/her line manager or equivalent must agree between them proportionate measures to manage the situation in order to mitigate the risk of undue influence and/or perceived impropriety. The outcome will be one of the following:
 - i. Acceptable/manageable level of risk: no further action required
 - ii. Acceptable with specific measures to mitigate risk
 - iii. Unacceptable level of risk: reallocation of the individual's responsibilities and/or exit from an external interest is required.Decision-making may be escalated as necessary according to the degree of risk involved or the nature of the decision to be taken. A flowchart for the procedure is provided as [Appendix 2](#).
 - c. The line manager must keep a record summarising the situation and what has been agreed in a central and accessible location within the department, and inform any relevant colleagues of the agreed approach. Depending on the nature of the interest, it may further be decided that the individual should record it in the relevant Register of Interests, if this is not already the case.
 - d. The individual concerned is responsible for adhering to what has been agreed, and should keep the situation under review, making further referrals if necessary.

C. Gifts and hospitality

1. Gifts and hospitality play an important part in HE, for example to strengthen a business relationship or to improve the profile of the University. In particular, they form a key feature of international relationships, rooted in cultural custom and politeness.
2. Key principles for the exchange of gifts and hospitality:
 - a. In line with the UK Bribery Act 2010, gifts and/or hospitality must not be offered or accepted where they might be intended or perceived as an inducement to influence a decision, or as a reward for the latter. They must not be exchanged in return for benefits or favours, nor to facilitate a routine business procedure. To comply with the Bribery Act 2010, any gifts or hospitality to foreign government officials, politicians or political parties must be notified to the Registrar & Secretary or the Director of Finance. All potential breaches must be reported as set out in the University's Anti-Bribery Policy.
 - b. Exchanges of gifts and/or hospitality should be avoided around key decision milestones (e.g. procurement exercises, decisions relating to student admission or progress).
 - c. Gifts and hospitality, whether given or received, must be proportionate in terms of frequency and scale, and appropriate to the occasion. As stated in the University's Financial Regulations (paragraph 3.3.4), the frequency and scale of hospitality accepted by staff should not be significantly greater than the University would be likely to provide in return.
 - d. Staff must comply with the rules governing expenditure on gifts and hospitality as set out in the University's Travel and Expenses policy.
 - e. Cash must not be given or received under any circumstances.

- f. Cash-equivalents may also not be given or received, with the exception of vouchers, book or other tokens offered as an incentive-based reward (e.g. to respond to a survey), or received by staff as a personal gift.
 - g. All exchanges must be open and transparent.
3. Offers of gifts and/or hospitality which run counter to these principles should be politely declined, making reference to the University's position. However, there may be instances where it is not possible to refuse a gift without causing offence. In such cases, staff should consider donating the gift to their department or to charity to avoid the perception of undue influence. Staff who are uncertain or concerned about the propriety of an exchange of gifts/hospitality (either given or received) should seek advice from their line manager/equivalent in the first instance (or, if the latter is also a beneficiary, from the line manager above). Further advice may also be sought from the Governance & Assurance Office in the first instance, who will refer on to the Finance Department and/or the International team as appropriate. Decision-making may be escalated via the routes set out in [Appendix 2](#) according to the degree of risk.
 4. In order to avoid misunderstanding or offence, departments are encouraged to make the University's policy clear to their students from the outset, and to emphasise that gifts and offers of hospitality to staff are not expected. Likewise, those organising overseas visits should seek mutual understanding in advance regarding acceptable hospitality and gifts. Further advice may be sought from the International team.

Record-keeping

5. Departments must maintain their own Gifts and Hospitality register at a local level in electronic format, using the template provided at [Appendix 3](#). Registers for Council and its sub-committees and for UEB will be kept by the Governance & Assurance Office on behalf of the Registrar and Secretary. For University-level international visits, staff are advised to use the register maintained by the International team in order to help maintain an overview of the University's global relationships.
6. Where gifts/hospitality are given or received over the value of £40 per person¹ (including the cumulative value of repeated low-level instances over a short period of time), the member of staff concerned must (a) inform his/her line manager, and (b) record the transaction in the relevant local Gifts and Hospitality register. This may be done at group level where appropriate. Where the exchange of gifts/hospitality is a regular occurrence between two parties, staff may choose to register all exchanges for the sake of transparency. If in doubt, staff are advised to make a declaration.
7. All gifts/hospitality which are declined as counter to University policy must also be recorded, regardless of value.
8. Staff are responsible for submitting complete and accurate information to the relevant register in a timely fashion. It is entirely acceptable for individuals to keep modest items such as pens, keyrings or food/drink for personal use. Symbolic corporate gifts such as ornamental items should be retained by the University (e.g. for display within the relevant department) and their location noted in the relevant gift/hospitality register.

¹ This aligns with the University's usual limit for hospitality expenditure per capita, above which expenditure requires formal written approval by the budget holder; and sits within the upper limit of £50 for expenditure on gifts given in the University's name, as agreed with HMRC. See the [Travel & Expenses Policy](#) for further details. The requirement to record the transaction in the relevant Gifts and Hospitality register is in addition to any approvals and/or declarations required under the Travel & Expenses Policy.

D. Breaches of this policy

1. If a member of the University has concerns relating to a potential breach of this policy, these can be raised via the following routes:

Concerns involving	Point of referral
Heads of academic departments	Relevant Faculty Dean
Heads of professional support services	Head of Directorate / Registrar & Secretary / Director of Finance as appropriate
Heads of professional support Directorates within Support Services	Registrar & Secretary
Members of UEB, including Director of Finance	Vice-Chancellor
The Registrar & Secretary or the Vice-Chancellor	Chair of Council or Chair of Audit and Risk Committee
Members of Council and its subcommittees, including Chair of Council	Senior Independent Lay Member of Council or Registrar & Secretary
Senior Independent Lay Member of Council	Chair of Council or Chair of Audit and Risk Committee
Other staff	Relevant Head of Department for the individual concerned

2. Concerns can also be raised via the University's Speak Up (Public Interest Disclosure) policy.
3. Advice may be sought from one or more of the following according to the nature of the case: Governance and Assurance Office, Finance Department, HR, Research & Enterprise, Student and Academic Services, or other relevant professional support services. Cases which involve potential financial misconduct must be referred to the Finance Department immediately. Cases with potential implications for research integrity must be referred to the Research Strategy and Policy Office for investigation under the University's Research Misconduct Policy and Procedure.
4. Failure to comply with this policy and associated procedures may result in disciplinary action under the University's Disciplinary Procedure. Where individuals are not formally employed by the University and are found in serious and/or repeated breach of this policy, the University will consider the need to terminate the association.

E. List of appendices:

- [Appendix 1](#): University of York Pro-forma for Declarations of Interests, including guidance for completion
- [Appendix 2](#): Flowcharts: routes for decision-making and escalation
 - Managing conflicts of interest
 - Gifts & Hospitality
- [Appendix 3](#): Template for Gifts & Hospitality registers

APPENDIX 1: UoY Declaration of interests pro-forma

Guidance for completion:

1. An individual's 'interests' are defined as any activity or association which has a potential or actual bearing on matters relating to the business and activity of the University. They include both the direct interests of the person employed by or appointed to act on behalf of the University, and those of their family, partner or spouse and close personal friends, or other internal or external associates. Interests may be financial or non-financial in nature.
 - A financial interest refers to anything of non-trivial monetary value, including but not limited to: pay, commission, consultancy, equity interest, forgiveness of debt, property, licensing income, honoraria.
 - A non-financial interest refers to any benefit or advantage including but not limited to: potential enhancement of an individual's career, education or professional reputation, access to privileged information or facilities and property, Intellectual Property rights.

2. All pecuniary, family or other personal interests which have a potential or actual bearing on matters relating to the business and activity of the University, including its subsidiary companies or joint ventures, must be declared. The table below indicates the kind of business interests and associated information which the register is likely to include.

Category of Interest	Information to be disclosed
Paid employment	Nature of employer and position held
Self-employment	Nature of business
Directorship of commercial companies, including University subsidiaries	Names of companies
Significant share holdings	Names of companies in which the corporation member owns, say, 1% or more of the issued share capital
Investments in University subsidiary companies	Name of company and extent of investment and/or shareholding
Elected office	Name of authority and office held
Trusteeships or participation in the management of charities and other voluntary bodies	Name of body and nature of office held
Public appointments (paid or unpaid)	Name of body and office held
Membership of professional bodies	Name of body
Interests which may influence University procurement decisions	Name of relevant supplier(s) and name of any relevant staff members involved

Consultancy undertaken as a private individual	Organisation name, nature or the relationship and indication of whether paid or unpaid
--	--

3. All required information must be provided in full. Declarations should describe the interest clearly, and where it carries financial interests, state whether these are direct or indirect. However, where a member or officer wishes to disclose the existence of an interest but is prevented on contractual or other grounds from disclosing specific information, they may choose to declare the broad category and nature of interest without necessarily naming the body or company concerned.

PLEASE NOTE:

- **Staff must ensure that they have informed the person/people responsible for oversight in their area of any interests which raise concerns, and indicate on the return itself that they have done so.**

Returns	Responsible for oversight
Departmental senior teams / local departmental registers	Heads of Department
Heads of academic departments	Relevant Deans of Faculty
Heads of Support Services	Registrar & Secretary (or his/her delegate)
Directors of University subsidiary companies	University Subsidiaries Management Group
Council, UEB and Senate	Registrar & Secretary, delegated to the Head of Governance & Assurance
Other University Committees	Committee secretaries, liaising with Committee Chairs

- **Formally declaring an interest does not necessarily mean that any potential or actual conflicts of interest have been satisfactorily addressed. Any potential or actual conflicts of interest must be actively managed on a case by case basis in line with the University's policy, in order to protect the good standing of the individual and the integrity of the University's activities.**
- **Individuals must ensure that their record is kept up to date and report any substantive additions or alterations promptly to the relevant Register, noting the date from which the changes are effective.**

Pro-forma:

Section 1: name; principal role(s) in completing the form

[to include a scroll down list to tick which roles apply, allowing reports to be run for particular groups]

Sections 2 – 5 disclosure of interests

2. Family and related interests

2.a. Family, friend or other connections who are current, former or known future employees or students.

Please specify details with names

2.b. Family, friend, associate: monetary, property or other contractual connection with individual, company or entity with which the University (or an entity owned by or associated with it) also has a relationship

Please specify details including name of individual or body and nature/value of transaction and connection

2.c. Are you in any way involved in contracts or transactions (monetary or non-monetary), with another company which the University (or an entity owned or associated with it) also has a relationship or contract?

Please specify details including the name of the individual or body and nature/value of the transaction and connection

3. Financial and Business Interests

3.a. *(Council members only)* Current or most recent employment since appointment to Council

3.b. Current remunerated (or other form of benefits) or unremunerated consultancy; please provide details

3.c. Do you hold any of the following which might in any way be previously, currently or likely to be linked/connected to the University or members of it?

- Shareholdings in a company of 5% or more of the issued share capital of the company
- Substantial property interests, or other non-cash or non-equity asset in a company or entity
- Trust or pension funds
- None of the above
- Other

Please specify details including the name of the individual or body and nature, value and duration of the transaction and connection

4. Company Directorships, Trusteeships and other external appointments

4.a. Are you a 'person with significant control' of another entity? This is defined as one or more of the following: (i) An individual who holds more than 25% of shares in the company, (ii) An individual who holds more than 25% voting rights in the company, (iii) An individual who hold the right to appoint or remove the majority of the board of directors of the company.

If yes, please provide details of the nature of the control for each relevant company/entity

4.b. Please list any Executive, Non-Executive Directorships, Trusteeships or other board positions you currently hold or held up until 31 July 2019, providing sufficient information such as the registered name and number of the company, charity or other entity and your term of office (start date and end date of existing term).

4.c. Please list membership of Professional, Statutory or Regulatory Bodies or academic and learned societies (please include the status and designation, such as Associate or Fellow)

5. Any other interests appropriate to disclose

Please refer to the supporting guidance for completing this form.

Section 6 Fitness and propriety (not public) (Council and UEB only)

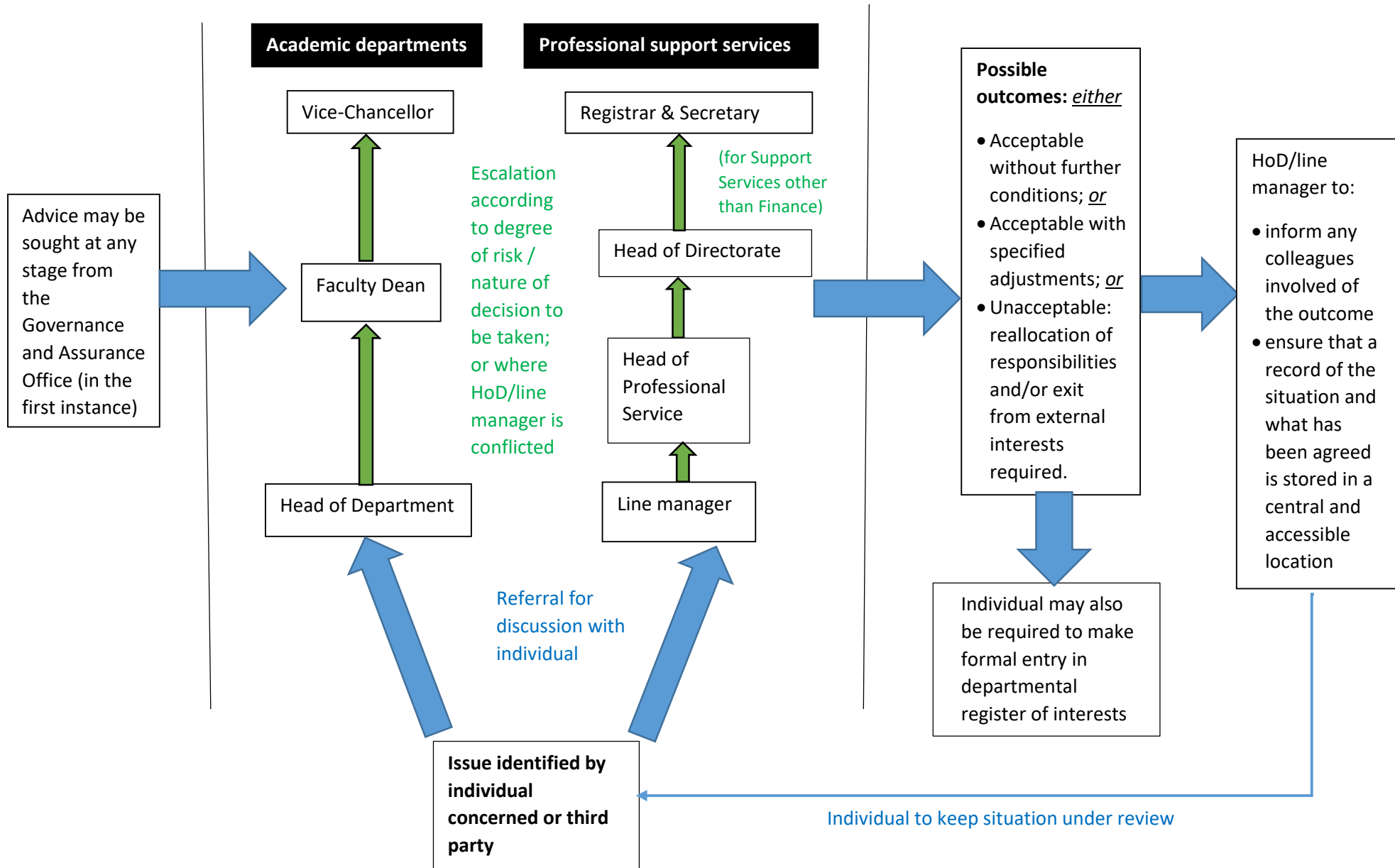
- Have you ever been disqualified from acting as a trustee or company director?
- Have ever been privy to, contributed to, or facilitated serious misconduct or mismanagement in employment?
- Have ever been suspended or dismissed from a position of trust?
- Have you been convicted of a criminal offence (other than a minor motoring offence, e.g., points) ?
- Have you been subject to disciplinary proceedings by a professional, statutory or other accrediting body?
- Have you ever been involved in a business that has gone into insolvency, liquidation or administration?

Section 7: E&D and other demographic data (Council only)

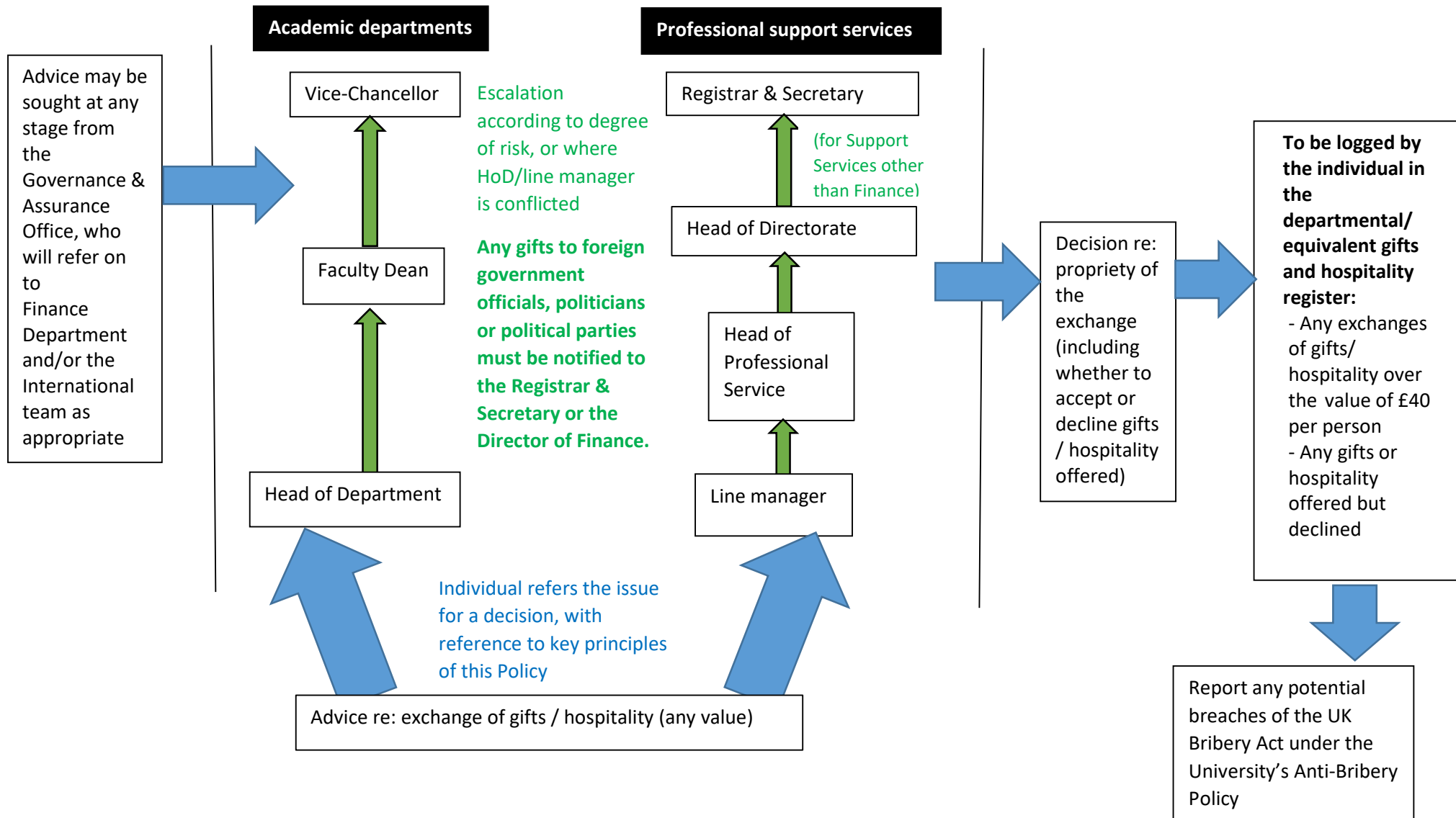
Date of submission:

- By ticking this box, I confirm that I have informed the person/people responsible for oversight of the relevant area of any interests which raise concerns

APPENDIX 2: Managing conflicts of interest: generic procedure



Procedures for the exchange of gifts and hospitality



APPENDIX 3: Template for gift/hospitality registers

1. Declaration submitted by (name/role, department or section):
2. Date of declaration:
3. Gift/hospitality offered by – name and organisation:
4. Proposed recipient(s) – name and organisation:
5. Date of gift/hospitality:
6. Description (including estimated value):
7. Circumstances/purpose, including relationship/future relationship between the parties involved:
8. For gifts/hospitality offered to those employed by or appointed to act on behalf of the University: *Accepted/declined* (note brief reasons for the latter)
9. For gifts/hospitality to foreign government officials, politicians or political parties: *I confirm that the Registrar & Secretary / Director of Finance has been notified.*
- 10: Location of gifts retained by the University: