

# Declaration of Interests Policy

## Summary

The Declaration of Interest Policy outlines the University's requirements for declaring and managing outside interests and work that may be a conflict of interest, protecting its reputation, eliminating any potential legal liabilities and ensuring compliance with national security regulations.

<b>Control information:</b>	<b>Control detail:</b>
<b>Owner</b>	Head of Central Services, Human Resources
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<b>Sponsor</b>	Chief People Officer, Human Resources
<b>Consulted</b>	Joint Consultation and Negotiation Committee (JCNC)
<b>Approved by</b>	University Executive Board
<b>Responsible area</b>	Human Resources
<b>Version</b>	3
<b>Approval date</b>	14 April 2026
<b>Effective date</b>	22 May 2026
<b>Interim review effective date</b>	Not applicable
<b>Full review period</b>	4 years
<b>Date of next full review</b>	14 April 2030
<b>EIA completion date</b>	10 March 2026
<b>DPIA completion date</b>	17 February 2026
<b>SIA completion date</b>	10 March 2026

<b>Reporting requirements</b>	Foreign Influence Registration Scheme (FIRS)
<b>Applicable statutory, legal or best practice requirements</b>	<p>National Security Act (2023) with specific reference to the Foreign Influence Registration Scheme (FIRS)</p> <p>Working Time Regulations (1998)</p> <p>Companies Act (2006)</p> <p>Bribery Act (2010)</p> <p>Higher Education and Research Act (2017) - The Public Interest Governance Principles</p> <p>Procurement Act (2023)</p> <p>Health &amp; Social Care Act (2022)</p> <p>Best Practice for Charities, Public Bodies and the Committee of University Chairs</p>
<b>Keywords</b>	<p>academic activity, appropriate manager, conflict of interest, conflict of loyalty, declaration of interests, external engagement, Foreign Influence Registration Scheme (FIRS), governance, honorary staff, MyERP, national security laws, outside work, private consultancy, public duties, research compliance, spin-out company, trade union duties</p>
<b>Related information</b>	<p><a href="#">Conflict of Interest Regulations</a></p> <p><a href="#">Staff student relationship guidance</a></p> <p><a href="#">Harassment and sexual misconduct policy</a></p> <p><a href="#">Consultancy services</a></p> <p><a href="#">Intellectual property rights</a></p> <p><a href="#">Anti-bribery policy</a></p> <p><a href="#">Whistleblowing policy</a></p> <p><a href="#">Acceptance and refusal of donations policy</a></p> <p><a href="#">Counter fraud policy</a></p> <p><a href="#">Ordinance 10, Section 4, Conduct</a></p> <p><a href="#">Ethics of research policy</a></p> <p><a href="#">Regulations on research misconduct</a></p>

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## 1. Updates to this policy

- 1.1. The policy has been rebranded from the Conflict of Interests – Outside Work Policy to the Declaration of Interests Policy. This recognises that not all activities and interests are automatically in conflict and some activities or interests do not constitute outside work, but should still be declared.
- 1.2. A new MyERP form, process and reports have been designed to ensure we are capturing the appropriate information and can meet audit and regulatory requirements. Adjustments have been made to the policy to reflect these process changes.
- 1.3. This policy has been updated to align to the new University of Bristol policy management framework.

## 2. Introduction

- 2.1. The University values external engagement and recognises the importance of this in terms of the benefits it brings to the University, the professional development of staff and our contribution to the academic and wider community.
- 2.2. However, outside interests may expose the University to risks, including unauthorised use of University resources, potential legal liability (including a breach of national security laws and regulations), and damage to the University's reputation. As such it is a requirement of the University that all members of the University (as defined by Ordinance 9, Student and Academic Status and University Membership) are to complete the My ERP declarations of interest page in accordance with this policy (as detailed in the [procedure](#)).
- 2.3. This policy should be read in conjunction with the University's [Conflict of Interest Regulations](#).
- 2.4. Remember: The overriding principle is that if in doubt, declare and seek permission.
- 2.5. **Aims of this policy:**
  - To provide further clarity on the Conflict of Interest Regulations as they specifically apply to staff interests.

- Provide a framework for the management of outside work opportunities available to staff to support our civic and global mission.
- Provide guidance for all individuals regarding identifying potential conflicts of interest, and the process of declaring such an interest.

### 3. Scope

- 3.1. This policy applies to all staff (as defined by Ordinance 9) and Postgraduate Research (PGR) Students who are employed by the University. It applies to all Honorary, Visting, Emeritus and Associate Staff.
- 3.2. The University Secretary's Office will manage declarations from members of the Board of Trustees, its subcommittees, and Subsidiary Company directors, who are not employees of the University. These declarations will be published on the University website. Further advice can be sought from the University Secretary's Office.
- 3.3. Note: The Research Compliance Team is on hand to advise on national security law (further details on what this encompasses are set out at the end of this document). Research Compliance can be contacted here: [research-compliance@bristol.ac.uk](mailto:research-compliance@bristol.ac.uk) or in relation to the Foreign Influence Registration Scheme (FIRS): [uob-firs-registrations@bristol.ac.uk](mailto:uob-firs-registrations@bristol.ac.uk).
- 3.4. Staff who are absent from work or do not ordinarily have access to systems should continue to observe this policy and declare new interests via a [Microsoft Word version](#) of the declaration form. The form should be stored locally within the school or section.

### 4. Definitions and principles

#### Outside work

- 4.1. "Outside work" means any work, income, or activity (paid or unpaid) undertaken by those identified as being in scope, for any external party. A conflict may arise when a member of staff undertakes external commitments which interfere with obligations arising under their contract of employment with the university.

### Conflict of loyalty

- 4.2. Means a situation, transaction, or other arrangement with or involving the university in which a member of staff has no financial or other personal interest but has a conflict between their duty to the university and their duty to another person (which may be because they are a governor, member of staff, director, shareholder, member, officer, or employee of that other person).

### Connected person

- 4.3. Means any person falling within one of the following categories:
- a. Any spouse or civil partner of a member of staff.
  - b. Any parent, child, brother, sister, grandparent, or grandchild of a member of staff who is financially dependent on such member of staff or on whom the member of staff is financially dependent.
  - c. The spouse or civil partner of any person in (b).
  - d. Any other person in a relationship with a member of staff which may reasonably be regarded as equivalent to that of a spouse or civil partner; or
  - e. Any company, limited liability company (LLC), limited liability partnership (LLP), or partnership of which a member of staff is a paid director, member, partner or employee or a holder of more than 10% of the share capital or capital.
  - f. Any member of staff who has connection to the nature of the outside work being undertaken.

### Conflict of interest

- 4.4. There are five central principles relating to all interests. They must not:
1. Impair the member of staff's quality of work or time available to perform university duties.
  2. Bring the university into disrepute.
  3. Put the university at financial risk.

4. Involve any other actual or perceived [conflict of interest](#).
5. Breach any statutory provision or other rights (including national security laws and regulations, including [working time regulations](#)).

4.5. A conflict of interest means any interest of a member of staff (as defined in the [scope](#) above), or any connected person to a member of staff that conflicts, or may conflict, or may be perceived to conflict, with the interests of the university and:

- a. Includes a conflict of loyalty.
- b. Applies to the exploitation of any information, property, or opportunity.
- c. Has a financial conflict i.e., 'Any equity ownership in a company if this could give the appearance of conflict and/or that involves a material level of control over that company (e.g., Ownership of more than 10% of the value of the business). Employees are not required to declare shares of minimal value or those held via investments in a pension scheme.'
- d. Has a potential conflict with national security laws and regulations.

#### Appropriate manager

4.6. The following definitions of 'appropriate manager' apply specifically for the purposes of this policy:

- For academic roles, the 'appropriate manager' is the head of school or (for more senior posts) the next appropriate senior role holder.
- For support staff roles, the 'appropriate manager' is the school/section manager or (for more senior posts) the next appropriate senior role holder.

4.7. Note: where there is a family or personal relationship between two members of staff or where an appropriate manager has an interest in what is being declared, neither member of staff should be involved in any decision or process, and the next senior manager should become the appropriate manager. In this circumstance a Microsoft word version of the form should be completed and sent to the HR Central Services Hub to keep on personal file.

## Consultancy

- 4.8. There are two potential routes for undertaking consultancy:
- **University consultancy:** Consultancy work, which is arranged and contracted through the University, via the [University consultancy procedure](#). Income for such work flows directly to the University, prior to any onward allocation. Legal liability for the work carried out normally rests with the University, and the University Consultancy Procedure requires the work to be fully costed and approved by the Head of School prior to establishing any such arrangement.
- 4.9. Consultancy work which is undertaken via this route does not require further permission but must be declared under the Declaration of Interests policy. (See [Type B: Interests requiring declarations only](#), section 8.)
- **Private consultancy:** Consultancy work which is arranged privately by the member of staff. The contract for the work is set up directly between the member of staff and the client, without any involvement or support from the University. Income flows directly to the member of staff. Professional liability for this work rests with the member of staff, who must ensure that the client understands clearly that they are not acting on behalf of the University. No University facilities or resources may be used in the carrying out of the work (unless this is agreed via a service rendered contract). The member of staff should be careful that they do not inappropriately hold themselves as the agent or representative of the University, for example by using a university email account, the University's headed notepaper or the University's address.
- 4.10. Consultancy work which is undertaken via this route requires prior permission and declaration under the Declaration of Interests Policy (see [Type A](#), section 7). Staff should also refer to the guidance on undertaking private consultancy on the [Division of Research, Enterprise, and Innovation Office's website](#).
- 4.11. The University Consultancy route is encouraged where possible. This offers benefits to both the University (in terms of risk management, strengthening engagement opportunities and the potential for future partnerships) and the

member of staff (in terms of the use of university resources, access to support and reduced personal liability).

## **5. Responsibilities**

### **5.1. Members of staff, honorary staff and postgraduate research (PGR) students who are employed by the University:**

- a. On joining the University: It is their responsibility to ensure they have followed this policy and have updated their declaration of interests tab on My ERP.
- b. To maintain and update their MyERP page and follow this policy to reflect any change of status related to their declared interests including if they:
  - Wish to undertake any new activities outlined in the declaration of interests policy.
  - Undertake any new work outside of the university.
  - Or for previously encountered situations, become aware of any potential conflict of interest that arises as the situation develops.
  - Or there is a change in status of any interest that was previously determined to constitute an actual perceived conflict of interest (this can be prompted by either a change in the individual's interests, a change to an aspect of their university duties, or a development in a situation).
- c. To ensure that interests are declared in meetings if a conflict of interest or a perceived conflict of interest arises.
  - Review agendas before meetings, declare any interests at the start of the meeting and leave the room when that agenda item is being discussed.
  - Where a meeting is of an informal nature and does not have a formal agenda, you should declare the interest as and when it arises and leave the room until the discussion is complete.
  - It is recommended that all meetings have a standing declaration of interests item at the start of the agenda.

## 5.2. **Board of Trustees:**

All trustees of the university must declare any potential conflict of interest as prescribed by [ordinance 5](#). The University Secretary's Office will manage declarations from members of the board of trustees.

Board and sub-committee members complete a declaration on joining/renewal and are asked to declare any new or agenda-specific interests at the start of each meeting.

## 5.3. **Appropriate manager:**

- a. Determine whether an interest is Type A or Type B.
- b. Give permission for any work, activity or interest that is [Type A](#) activity.
- c. Review their staff interest declarations on MyERP, ensure they are complete and that the appropriate manager is aware of any [Type B](#) and [Type C](#) activities.

## 6. **Declarations, permissions and nil returns**

- 6.1. The activities listed in [Type A](#), section 7, require declaration and prior permission under this policy to enable any potential conflict to be identified, assessed and where possible, resolved prior to the activity commencing.
- 6.2. The activities listed in [Type B](#), section 8, are exempt from requiring permission but must still be declared in line with this policy (see [Type B: Interests requiring declaration only](#), section 8). This is on the basis that they may not breach or may not be reasonably perceived to potentially breach, the central principles of [Conflict of Interest](#) (section 4).
- 6.3. For staff in scope who do not have any Interests the University requires a nothing to declare return to confirm that this is the case.
- 6.4. All declarations can be made via the [Declaration of Interests tab, under the personal details in MyERP](#).

## **7. Type A: Interests requiring declaration and permission**

- 7.1. Members of staff in scope and wishing to undertake the following activities must seek prior permission from the Appropriate Manager and declare both the managers decision and the activity by updating their declaration of interest tab on My ERP (as detailed in the [Procedure](#)).
- a. Holding executive directorships
  - b. Holding non-executive directorships
  - c. Remunerated employment outside the University
  - d. Other relevant sources of income from outside the University
  - e. Services that you undertake for the University on a self-employed basis or via an intermediary business which are not paid through payroll.
  - f. Working for a University spin-out company (one based on the University's intellectual property) including being a Shareholder, Director, Part-time employee or Consultant.
  - g. Undertaking private consultancy (see [Consultancy](#), section 4, for further details).
  - h. Undertaking private clinical medical work
  - i. Acting as an expert witness in civil or criminal proceedings
  - j. Working with a foreign entity that has the potential to lead either directly or indirectly to influencing UK policy.
  - k. Any other form of Outside Work, including those that are normally exempt (see [Type B](#), section 8), which could be viewed to breach of the principles of [Conflict of Interest](#), (section 4.4)

## **8. Type B: Interests requiring declaration only**

- 8.1. The activities detailed in this section are forms of interest which do not normally require prior permissions/approval but will still need to be declared in line with this policy and the employee must update their Declarations of Interest tab on My ERP.

## Normal academic activity

- 8.2. The following external activities are regarded and recognised as a normal part of the academic role. They play an important part in both raising the profile of the member of staff and the University and our contribution to the wider academic community.
- 8.3. Staff are encouraged to seek and accept opportunities to undertake these activities, provided they do not adversely affect their overall performance in their role. Staff should discuss the level and nature of such commitments with their appropriate line manager.
- a. Presenting academic papers outside the University
  - b. Giving lectures and seminars outside the University
  - c. External examining
  - d. Editing academic journals or a book series
  - e. Reviewing books
  - f. Refereeing academic articles
  - g. Acting as a Quality Assurance Agency (QAA) assessor, member of a Research Excellence Framework (REF) panel, or as a REF consultant for other institutions.
  - h. Acting as a member of a research council
  - i. Acting on the board of a research charity
  - j. Serving on a research committee of a government department
  - k. Working with Quasi-Autonomous Non-Governmental Organisations (QUANGOs) or similar bodies
  - l. Sitting on the governing body of another educational institution
  - m. Serving a learned or professional association
  - n. Writing popularising books within the relevant discipline
  - o. Writing textbooks in the relevant discipline

- p. Providing information and interviews to the media on topics within the discipline
  - q. Writing and presenting a television, radio or podcast series
  - r. Writing regular articles for newspapers or magazines
  - s. Curating, or advising on, a temporary exhibition or permanent collection.
- 8.4. Staff should always discuss the level and nature of external activities and commitments with their appropriate line manager and if they agree a Conflict of Interest exists or could be perceived to exist, staff should complete the declaration of interest form in MyERP.
- 8.5. This form can be found by selecting 'Forms' in the menu option on the left and then choosing **Declaration of Interests**. The guidance on how to complete this form, including a video 'Show Me', can be found on the MyERP Support Site - [Declaring interests](#). If you have any issues, you can also find contacts on the right-hand side of this support page.
- 8.6. All data will be processed in accordance with the [staff fair processing notice](#).

#### Professional support staff

- 8.7. It is recognised that Professional Services staff may also undertake some of the activities or interests outlined in this policy.
- 8.8. Staff are encouraged to seek and accept opportunities to undertake these activities, provided they do not adversely affect their overall performance in their role. Staff should discuss the level and nature of such commitments with their appropriate line manager when an opportunity arises and declares any conflict of interest in line with the definitions and procedure within this policy as soon as possible.

#### Public duties and volunteering

- 8.9. The University recognises that it has a civic responsibility to enable staff to take on public duties (e.g., acting as a Justice of the Peace, Local Authority Councillor or School Governor). Staff can take up to 18 days' paid absence per year to undertake such duties. The University also provides an additional day's paid leave

for staff to participate in general volunteering activities. For further information, please refer to the [Public Duties and Volunteering guidelines](#). The University requires staff to update their Declaration of Interests tab on My ERP with information pertaining to Public Duties and Volunteering.

#### Trade union duties

- 8.10. Elected representatives are entitled to reasonable time off to carry out duties as a trade union representative.

#### **9. Type C: Nil returns**

- 9.1. For staff in scope who do not have any Outside Work to declare the University requires staff to update their Declaration of Interests tab on My ERP with a nil return.

#### **10. Monitoring and review**

- 10.1. Staff and Postgraduate Research (PGR) Students who are employed by the University must update their Declaration of Interests tab on My ERP (as detailed in the [Procedure](#)).
- 10.2. The University Secretary's Office will manage declarations from members of the Board of Trustees. All Trustees of the University must declare any potential conflict of interest as prescribed by Ordinance 5. A master [Register of interests](#) is held of all declarations across the Board, UEB, and subsidiary companies.
- 10.3. The University will conduct annual interest audits. This will ensure full disclosure of all interests (including those that do not need permissions and nil returns).

#### **11. Failure to avoid/declare/mitigate conflicts of interest**

- 11.1. The following may lead to disciplinary action being instigated against an individual:
  - a. Failure to declare a potential conflict of interest.
  - b. Failure to declare a potential conflict of interest in a timely fashion.
  - c. Failure to mitigate against the actual or perceived conflicts of interest declared to them by another individual when that is their responsibility.

- 11.2. Note: Individuals must comply with an external organisation's conflicts of interest policy, as well as this policy, when working with that organisation (e.g., academics acting as editors of academic journals).

**Request this policy in an alternative format**

If you need this policy in a different format, email [uob-policymanager@bristol.ac.uk](mailto:uob-policymanager@bristol.ac.uk). In your message, include the format you need, for example: plain text, braille, BSL, large print or audio.

# Appendix 1: Procedure

## 1. Procedure for declaring, obtaining permission to undertake outside work and submitting nothing to declare returns

For Members of staff and Postgraduate Research (PGR) Students who are employed by the University

- 1.1. On joining the University: It is your responsibility to ensure you have followed this policy and have updated your Declaration of Interests tab on My ERP.
- 1.2. Thereafter, you must report any interests in real time. Examples could include:
  - a. Undertaking any new activities outlined in this policy.
  - b. Undertaking any new outside work.
  - c. For previously encountered situations, becoming aware of any potential conflict of interest that arises as the situation develops.
  - d. Where there is a change in status of any interest that was previously determined to constitute an actual perceived conflict of interest (this can be prompted by either a change in the individual's interests, a change to an aspect of their university duties, or a development in a situation).

## 2. Request permission for Type A work

- 2.1. Those in scope wishing to undertake any of the outside work activities listed as Type A in [section 7](#) of the Declaration of Interests Policy should complete an online declaration of interests form in MyERP.

### Considering requests

- 2.2. Requests should be assessed against the five central principles governing outside work outlined in the [Definitions and principles](#) section of the Declaration of Interests Policy.
- 2.3. Heads of Schools/Heads of Sections should also refer to the further [Decision Makers Guidance and Decision Matrix](#) and seek advice via their Head of HR Business Partnering where appropriate.

- 2.4. The appropriate Heads of School/Heads of Section should determine in MyERP as part of the workflow whether the Type is Type A or whether it can be downgraded to Type B.

#### Confirming outcomes/declarations

- 2.5. The Appropriate Manager will confirm one of three outcomes to the employee: approved, approved with conditions, rejected. Where permission to undertake Outside Work is granted, this will be subject to annual review to ensure the decision remains appropriate.

#### Appeals

- 2.6. If an employee wishes to appeal against a decision they should write to the Chief People Officer, HR within 14 days of receiving the written notification of the decision, setting out the reasons for the appeal.
- 2.7. The Chief People Officer, HR will then arrange for the appeal to be considered by an Appropriate Manager who has had no prior involvement in the case, supported by HR. The Appropriate Manager may seek guidance from staff who are considered experts in a particular field.
- 2.8. The decision may be given at the appeal hearing and will in any event be confirmed in writing within 14 days of the hearing.
- 2.9. The decision following the appeal shall be final.

### **3. Type B activities**

- 3.1. Members of staff in scope wishing to undertake any [Type B activities](#) (section 8 of the Declaration of Interests Policy) must declare these in line with the policy and complete an online declaration form in MyERP.
- 3.2. This form can be found by selecting 'Forms' in the menu option on the left, and then choosing Declaration of Interests Form. The guidance on how to complete this form, including a video 'Show Me', can be found on the MyERP Support Site. If you have any issues, you can also find contacts on the right-hand side of this support page.

- 3.3. The appropriate Head of School/Head of Section will review the declaration against the guiding principles and [Decision Makers Guidance and Decision Matrix](#). They will then allocate either Type A or Type B and communicate the outcome.

#### **4. Type C: Nothing to declare return**

- 4.1. Members of staff, in scope, who do not have any interests to declare ([Type C: Nil returns](#), section 9 of the Declaration of Interests Policy) must complete an online declaration form in MyERP.
- 4.2. This form can be found by selecting 'Forms' in the menu option on the left, and then choosing Declaration of Interests Form. The guidance on how to complete this form, including a video 'Show Me', can be found on the MyERP Support Site - MyERP – [Declaration of Interests](#). If you have any issues, you can also find contacts on the right-hand side of this support page.