

Disclosure Procedure

Appendix II UPR GV17 version 01.0

Policies superseded by this document

This is a new policy.

Summary of significant changes to the previous version

There is no previous version, although this new policy does take precedence over and partially replace the previous Bribery and Corruption Policy (UPR GV12 version 04.0).

Glossary

A glossary of approved University terminology can be found in [UPR GV08](#).

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1 Register of Personal Interests (Register I)

- 1.1 The Secretary and Registrar will maintain a Register of Personal Interests, which will be confidential, save in respect of information which the University is required to make public in compliance with applicable legislation or regulation.
- 1.2 Information about the interests of members of the University (including staff and governors, but not students) will be held on the Register of Personal Interests for the term of an individual's employment, consultancy or association with the University and for a period of seven (7) years following the termination of that relationship.
- 1.3 The Conflicts of Interest Committee will be permitted to inspect the Register of Personal Interests. Senior management and Heads of SBU (and those involved in regulatory processes, such as the Head of Procurement and Group Accountant) will also be permitted to inspect the Register of Personal Interests in order to assist with the management of any conflicts of interest within their specific areas.
- 1.4 Members of staff will be permitted to inspect the information recorded/held on the Register of Personal Interests about them by applying to the Secretary and Registrar for permission and providing satisfactory proof of identity.
- 1.5 Managers and investigating officers may seek permission from the Secretary and Registrar to review an individual's entry in the Register of Personal Interests as part of the investigation of a complaint, whistleblowing, or disciplinary matter.
- 1.6 Access to the Register of Personal Interests will be at the discretion of the Secretary and Registrar, who may allow or prevent access to the information held on the Register of Personal Interests in such way as meets the public interest in disclosing and managing conflicts of interest and permits the proper management of the University and the conduct of its business in accordance with this policy.

2 Register of Corporate Interests (Register II)

- 2.1 The Secretary and Registrar will maintain a Register of Corporate Interests, which will be confidential, save in respect of information which the University is required to make public in compliance with applicable legislation or regulation.
- 2.2 Information about the financial and other interests held by the University and covered by this policy will be held on the Register of Corporate Interests for the period of time for which that interest subsists and for a period of seven (7) years following the end of that interest.
- 2.3 The Conflicts of Interest Committee will be permitted to inspect the Register of Corporate Interests. Senior management and Heads of SBU (and those involved in regulatory processes, such as the Head of Procurement and Group Accountant) will also be permitted to inspect the Register of Corporate Interests in order to assist with the management of any conflicts of interest within their specific areas.
- 2.4 Access to the Register of Corporate Interests will be at the discretion of the Secretary and Registrar, who may allow or prevent access to the information held on the Register of Corporate Interests in such way as meets the public interest in disclosing and managing conflicts of interest and permits the proper management of the University and the conduct of its business in accordance with this policy.

3 Declaration of interests

3.1 Members of the Board of Governors, Vice-Chancellor, Deputy Vice-Chancellor, Group Finance Director, Secretary and Registrar, Pro Vice-Chancellors, Directors of the University's wholly owned subsidiary companies

- 3.1.1 The above individuals must declare their interests to Governance Services on an annual basis, using the appropriate form provided by the University. Should there be any change to their interests in the meantime, they must inform the Secretary and Registrar within twenty (20) working days and, as appropriate, provide an update to Governance Services.
- 3.1.2 Matters to be reported by this individuals include (but are not limited to): directorships; trusteeships; memberships of trade, professional, regulatory, statutory and other associations; titles and positions held; substantive shareholdings; positions on government advisory bodies and/or quasi autonomous non-governmental organisations; memberships of research funding bodies; and any other involvement (in person or through family members) with organisations who might transact or interact with the University or where such involvement might lead to the perception of a conflict of interest.
- 3.1.3 Such declarations will be a matter of public record and will be published (and regularly updated) on the University's website.
- 3.1.4 Should a Governor of the University register as a student of the University, this matter must also be declared.

3.2 All other members of staff

- 3.2.1 All other members of staff must declare their interests to their Head of SBU on an annual basis, and, in addition, as soon as possible following any change in such interests.
- 3.2.2 Matters to be reported by these individuals include (but are not limited to): directorships; trusteeships; memberships of trade, professional, regulatory, statutory and other associations; titles and positions held; substantive shareholdings; positions on government advisory bodies and/or quasi autonomous non-governmental organisations; memberships of research funding bodies; and any other involvement (in person or through family members) with organisations who might transact or interact with the University or where such involvement might lead to the perception of a conflict of interest.
- 3.2.3 The Head of SBU must return all information to Governance Services on an annual basis, and the Register of Personal Interests shall be updated accordingly.

3.3 Students

- 3.3.1 Students must inform their supervisor or another appropriate member of staff of any conflict of interest which might affect their time at the University. Whilst student conflicts of interest will not be recorded on the Register of Personal Interests, where staff become aware of them, they should be managed in accordance with this policy, including discussion with the Heads of the relevant SBU or the Conflicts of Interest Committee, where appropriate.
- 3.3.2 The Secretary and Registrar (or nominee) will report annually to the Audit and Risk Committee the number and type of declarations made under this policy and alert the appropriate officers or body where there is evidence of under-reporting by any member of the University.
- 3.3.3 The Secretary and Registrar will, at the earliest opportunity, alert the Vice-Chancellor, the Audit and Risk Committee and (if appropriate) the University's auditors to any serious conflict of interest which has arisen and the name of the individual who has declared it and the nature of the conflict.

4 Additional matters to be declared

4.1 Gifts and hospitality

All gifts and hospitality must be declared in accordance with the **Gifts and Hospitality Policy** (UPR GV18).

4.2 Private work, including private consultancies and contracted work

All such matters must be declared.

4.3 Close personal relationships

4.3.1 Immediate family and close personal relationships

- a All immediate family and close personal relationships which could give rise to a conflict of interest must be declared.
- b All individual family members and/or individual parties in close personal relationships who are associated with the University or fall within the scope of this policy are required to make such a declaration.

4.3.2 Immediate family and close personal relationships that may affect students or the student experience

Any family or close personal relationship that affects or could reasonably be expected to affect the student experience or the relationship with students must be declared (albeit that this should, where appropriate, be handled confidentially).

4.3.3 Other family and close personal relationships

Where the above provisions of this section 4.3 do not apply, members of the University are required to declare to the Secretary and Registrar (or nominee) any family relationship or close personal relationship which could give rise to a conflict of interest during their period of employment/association with the University.

Sharon Harrison-Barker
Secretary and Registrar
Signed: **1 August 2021**

Alternative format

If you need this document in an alternative format, please email us at governanceservices@herts.ac.uk or telephone us on +44 (0)1707 28 6006.