Handy Guide to the University’s Register of Interests

University Ordinance XVIII requires all Members of the University to declare any personal interest that might reasonably be deemed to compromise impartiality, conflict with duty as an employee, or result in private benefit (see Appendix A below). This is executed through the University’s Financial Regulations and Procedures, in particular, Financial Regulation 10.24 and Financial Procedures 10.57 to 10.89. These documents are both on the University web-site:

Finance Directorate site: www.staffnet.manchester.ac.uk/services/finance

They can also be located on the University Policies and Procedures web-site:

http://documents.manchester.ac.uk/listofpolicies.aspx

Compliance with these rules is mandatory for all University staff (including honorary and emeritus staff), as well as other members of the University such as students and Board members. Anyone who fails to do so may be subject to action under the University’s disciplinary procedures. Managers must ensure that staff are familiar with their requirements.

This Handy Guide is not a replacement or substitute for the Financial Regulations and Procedures, and staff should ensure they are familiar with them.

Declaration of Interests by Staff

Staff must declare any personal interest that may compromise or might be reasonably deemed to compromise impartiality, conflict with duty as an employee or could potentially result in a conflict of interests leading to private benefit.

Heads of Schools must maintain a Register of Interests where staff must declare all personal interests. The Registrar, Secretary and Chief Operating Officer maintains a Register for PSS staff. All staff on Grade 6 and above (and any other staff with possible conflicts of interest) must complete an annual return (including nil returns) at the start of each academic year, and update the Register more frequently if their circumstances change. Staff must include relevant known interests of spouses, partners or close family members.

Honorary Staff

The term “honorary members of staff” may cover several situations. All such staff are unpaid (so honorary) – some are retired or visiting staff who are only on the HR system so they can use the Library and IT Systems, and play no part in management or decision making. Such people will not need to sign the Register of Interests.

However, especially in the Faculty of Biology, Medicine and Health, the term may also cover senior staff, who work for both an outside organisation (usually the NHS) and the University (teaching students and / or conducting research). There is a long standing arrangement whereby such staff have two contracts of employment, one with the NHS (who pay them) and an “honorary contract” with the University. The University reimburses the NHS for a proportion of their salary costs.

Schools must consider whether these staff are likely to make contractual decisions or commitments on behalf of the University of Manchester? For example, will they:

- Sit on appointment panels for staff;
- Recruit, teach or examine students;
- Review tenders, apply for research grants or advise or sign contracts with suppliers or funders?
Anyone who fulfils any of these roles should complete the Register of Interests, even if they are officially an honorary member of staff.

**Conflicts of Interest**

A conflict of interest arises if an employee’s personal interests could result in them benefiting from decisions taken by the University. All significant Conflicts of Interest must be declared in the Register of Interests. Staff must withdraw at once from all involvement in discussion and decision taking relating to the University’s transaction or other business. In particular, no person shall be a signatory to a University contract where he or she also has an interest in the activities of the other party.

**Examples of Information that must be disclosed**

<table>
<thead>
<tr>
<th>CATEGORY OF INTEREST</th>
<th>INFORMATION TO BE DISCLOSED</th>
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<tbody>
<tr>
<td>Paid employment</td>
<td>Name of employer and post held</td>
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<tr>
<td>Self-employment</td>
<td>Nature of business</td>
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<td>Directorships of commercial companies (including spin-out and dormant companies)</td>
<td>Names of companies</td>
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<tr>
<td>Elected office</td>
<td>Name of authority and office held</td>
</tr>
<tr>
<td>Trusteeships or participation in the management of charities and other voluntary bodies</td>
<td>Name of body and nature of office held</td>
</tr>
<tr>
<td>Public appointments (paid or unpaid)</td>
<td>Name of body and office held</td>
</tr>
<tr>
<td>Membership of professional bodies</td>
<td>Name of body</td>
</tr>
<tr>
<td>Significant involvement with any organisation with which the University does or might do business (if not covered above)</td>
<td>Name of body and nature of involvement</td>
</tr>
<tr>
<td>A major shareholding (more than 1 per cent of share capital) in a company with which the University does or may do business (including spin-out companies)</td>
<td>Name of company</td>
</tr>
<tr>
<td>The receipt of gifts over the value of £25 forthcoming as a result of their employment by the University</td>
<td>The nature, value and origin of the gift</td>
</tr>
<tr>
<td>Any personal interest in University business or negotiations in which they are involved</td>
<td>Brief details of the personal interest</td>
</tr>
<tr>
<td>Any personal interest in the appointment of staff and/or payment of fees and expenses or other personal payments to non-staff</td>
<td>Brief details of the personal interest</td>
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The above list is not exclusive: personal interests may arise in other circumstances.
Examples of Information that need not be disclosed

- There is no requirement to declare an interest solely through being an employee or a student of the University.
- Membership or attendance at a church, synagogue, mosque or other place of worship.
- Membership of a sports club, charity, voluntary body, trade union, pressure group or political party. However, a person who holds a position of authority (such as a board member or trustee, even if unpaid) in such a body must declare this when the organisation has a business or similar link to the University.

Professional Bodies

The term “professional bodies” encompasses organisations that impose obligations and claim authority over their members. Examples include the various Royal Colleges of medicine, the Law Society and Bar Council and professional bodies in areas such as accountancy, procurement, personnel management and surveying. All such memberships must be declared in the Register of Interests.

Bribery Act: All University staff, students and agents must never give, receive or facilitate bribes. Any offer or suggestion of a bribe must be reported to management. See: [http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=17994](http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=17994)

Consultancy and Outside Work: All staff must comply with the University Policy on Outside Work and Consultancy. All work for outside organisations (even if unpaid) must be declared on the Register of Interests. This is in addition to the requirement that outside work is approved by the Head of School (or equivalent). See: [http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=7929](http://documents.manchester.ac.uk/DocuInfo.aspx?DocID=7929)

Gifts

Personal inducements to employees from existing or potential suppliers of goods or services to the University are forbidden. The only exception is items of small intrinsic value such as pencils, diaries, calendars, office stationery and promotional mugs. All gifts of a higher value must be declined. If this is not possible, they must be declared in the Register of Interests and surrendered immediately to the Head of School or to the Registrar, Secretary and Chief Operating Officer.

Once a gift has been offered or promised, staff must act as if it has already been received. All gifts with a value over £25 must be entered into the Register of Interests.

Gifts from potential, current or former students or their families must be declared and, if worth in excess of £25, staff must withdraw from any involvement in decisions regarding the student concerned. This includes marking or assessment in any “non-anonymous” examinations, and discussions at meetings of Boards of Examiners.

Confidentiality

Where a member of staff wishes to disclose the existence of an interest but is prevented on contractual or other grounds from disclosing specific information, he or she may choose to declare the broad category and nature of interest without necessarily naming the body or company concerned.

This does not remove the duty to declare a significant conflict of interest to the Head of School.

School Governors

When staff serve as a school or college governor there should normally be no conflict of interests, but it should still be declared to ensure transparency.
Queries: General
The Head of School Administration is usually the main source of guidance for School staff, although the Head of School may delegate this role to another person. Staff in PSS should consult the Director of their area. Queries regarding the operation of the Register of Interests system can be made to the School’s System Administrator or the Finance Helpdesk.

University Governance: Mark Rollinson, Deputy Secretary - Governance Office

Financial Regulations and Procedures
Laurence Clarke, Internal Control Accountant: ext. 52139,
laurence.a.clarke@manchester.ac.uk

Anti-Bribery Officer
David Barker, Director of Compliance and Risk: ext. 55798
david.barker@manchester.ac.uk

Finance Helpdesk
Phone 62535 or email: finance.helpdesk@manchester.ac.uk

Appendix A: Extract from University Ordinance XVIII
University Ordinance XVIII states:

“The Board expects all Members of the University to conduct themselves with due regard to probity and propriety in the course of their employment (if applicable), and in their other dealings with the University, according to the principles of behaviour set out in Article III.4 of the Charter and according to the seven principles of behaviour arising from the Nolan Committee Report on Standards in Public Life (demonstrating selflessness, integrity, objectivity, accountability, openness, honesty, and leadership).

They should declare to the appropriate authority, in accordance with issued guidance, any personal interest that may compromise or might reasonably be deemed to compromise impartiality, conflict with duty as an employee, or result in private benefit. In particular, Members of the University serving on University committees or other similar bodies must declare any personal interest in the business to be discussed and, if necessary and as required, withdraw from the consideration of such business.”