# HANDY GUIDE TO THE UNIVERSITY’S REGISTER OF INTERESTS

1. **What is the Register of Interests?**

The Register of Interests holds a record of all interests of all members of the University that might reasonably be deemed to compromise impartiality, conflict with duty as an employee, or result in private benefit ([see Appendix A below](#AppendixA)). This is currently stored in an online system (new system to be launched March 2025).

1. **Why do interests need to be declared?**

**2.1 Financial Regulations**

University Ordinance XVIII requires all Members of the University to declare any such personal interests ([see Appendix A below](#AppendixA)).

This is executed through the University’s [**Financial Regulations and Procedures**,](https://www.staffnet.manchester.ac.uk/finance/internal/financial-control/financial-regulations-and-procedures/) in particular, Financial Procedures 10.57 to 10.89. Compliance with these rules is mandatory for all University staff (including honorary and emeritus staff).

This Handy Guide is not a replacement or substitute for the [Financial Regulations and Procedures](https://www.staffnet.manchester.ac.uk/finance/internal/financial-control/financial-regulations-and-procedures/), and staff should ensure they are familiar with them.

# 2.2 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

# Which staff need to declare interests?

# 3.1 Staff at Grade 6 or above

All Staff at Grade 6 or above 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. Staff under Grade 6 may need to declare specific interests depending on their job role or department. If this is the case, staff will be advised by their line manager.

All staff must complete an annual return at the start of each academic year and update it if their circumstances change. Staff with no interests to declare must submit a ‘nil’ return.

# 3.2 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 People and OD system so they can use the Library and IT Systems, and play no part in management or decision making.

However, the term may also cover senior staff, who work for both an outside organisation (e.g. 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 external organisation who pays them and an “honorary contract” with the University. The University reimburses the organisation for a proportion of their salary costs. Therefore, there may be honorary members of staff who:

* 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.

Honorary members of staff, in particular those who are likely to make contractual decisions or commitments on behalf of the University of Manchester, should complete the Register of Interests.

1. **What interests should be disclosed?**

**4.1 Information that must be disclosed**

The table below sets out examples of the kinds of interests that must be disclosed and the information that will be required for this disclosure.

|  |  |
| --- | --- |
| **CATEGORY OF INTEREST**  | **INFORMATION TO BE DISCLOSED**  |
|  Paid employment  Self-employment  Directorships of commercial companies (including spin-out and dormant companies)  Elected office  Trusteeships or participation in the management of charities and other voluntary bodies  Public appointments (paid or unpaid)  Membership of professional bodies  Significant involvement with any organisation with which the University does or might do business (if not covered above)  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)  Any personal interest in University business or negotiations in which they are involved  Any personal interest in the appointment of staff and/or payment of fees and expenses or other personal payments to non-staff  |  Name of employer and post held  Nature of business  Names of companies   Name of authority and office held  Name of body and nature of office held  Name of body and office held  Name of body  Name of body and nature of involvement   Name of company    Brief details of the personal interest  Brief details of the personal interest  |

The above list is not exhaustive: personal interests may arise in other circumstances. For research staff, there may also be specific disclosure requirements from your funder, please see [paragraph 4.1.3](#ResearchFunding) below for more information.

[Appendix B](#AppendixB) outlines a number of case studies illustrating the various interests which may need to be disclosed.

If you are unsure whether an interest should be disclosed, please discuss with your line manager or contact the ROI mailbox: ROI@manchester.ac.uk

Please note that for some forms of outside employment you may need further approval. Please see the new [Work for Outside Bodies Policy](https://documents.manchester.ac.uk/display.aspx?DocID=75526) and [guidance](https://documents.manchester.ac.uk/protected/display.aspx?DocID=75530) for further information on the approval process.

For guidance on completing the declaration, please see the [guidance pages](https://livemanchesterac.sharepoint.com/sites/UOM-ROI/help/SitePages/Submitting-Initial-Return.aspx).

# 4.1.1 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.

**4.1.2 Consultancy and Outside Work**

All work for outside organisations (even if unpaid) **must be declared on the Register of Interests. However, there are specific activities/work that also require formal approval by the Head of Department (or equivalent)**.

An updated [Work for Outside Bodies Policy](https://documents.manchester.ac.uk/display.aspx?DocID=75526) has now been launched replacing the previous Policy on Outside Work and Consultancy. This policy clarifies the type of outside work that requires approval and reiterates the requirement to ensure all external activity is declared on the Register of Interests. Please see the [Work for Outside Bodies Guidance](https://documents.manchester.ac.uk/protected/display.aspx?DocID=75530) for further information.

Outside work conducted internationally may be subject to further scrutiny. Please see the information on [Export Controls](https://www.staffnet.manchester.ac.uk/export-controls-info/) and the [related forms](https://www.staffnet.manchester.ac.uk/export-controls-info/collaborators-funders/register-interests/) for guidance.

For information on University Consultancy please see the updated [University Consultancy Policy](https://documents.manchester.ac.uk/display.aspx?DocID=75531) and refer any questions to the[Consultancy Services Team.](https://www.staffnet.manchester.ac.uk/rbe/beke/consultancy/)

**4.1.3 Research Funding**

Potential conflicts of interest may also need to be reported to the research funder, in accordance with the terms and conditions of funding. If you are in receipt of research funding you must comply with the necessary disclosures set out by the funder in addition to recording the details on your University register of interest.

For example:

UK Research and Innovation (UKRI): There is an additional declaration of interests process for research projects funded by UKRI As part of this, any private, personal or commercial interests relating to an application for funding to UKRI must be declared in a covering letter included as an application attachment You can read more about what interests should be declared and how potential conflicts should be managed on the [UKRI Conflicts of Interest web page](https://www.ukri.org/about-us/how-we-are-governed/conflicts-of-interests/).

# National Institutes of Health (NIH): For funding from the National Health Institutes (NIH) you will need to follow the [Procedures for the NIH financial conflict of interest](https://documents.manchester.ac.uk/display.aspx?DocID=24603).

Wellcome Trust: For funding from the Wellcome Trust you will need to comply with their [policy on conflicts of interest](https://wellcome.org/grant-funding/guidance/intellectual-property-guidance/conflicts-interest-policy-wellcome-funded-researchers-and-commercial-organisations).

# 4.1.4 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.

# 4.1.5 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.

**4.1.6 Gifts and Hospitality**

If staff receive gifts or hospitality from an outside body, this does not have to be declared on the Register of Interests, however they should inform their Head of School/Directorate. Any gifts or hospitality of a greater value than £25 should be declared separately on the locally held Register of Gifts and Hospitality. Please see paragraphs [10.70 – 10.76 of the Financial Procedures](https://documents.manchester.ac.uk/protected/display.aspx?DocID=1742) for further information.

**4.2 Examples of Information that need not be disclosed**

(NB 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.
	1. **Nil Return**

If you have no interests to disclose, you are still required to complete a return each year. The system will record a ‘Nil’ return, which demonstrates that you have compiled with the process but have no interest to disclose.

# Queries and Further Information

Queries regarding the operation of the Register of Interests system can be made to the ROI mailbox roi@manchester.ac.uk

Further information is available from:

[Financial Regulations and Procedures](https://www.staffnet.manchester.ac.uk/finance/internal/financial-control/financial-regulations-and-procedures/)

[Register of Interests](https://www.staffnet.manchester.ac.uk/finance/internal/financial-control/register-of-interests/)

1. **Appendices**

[Appendix A: Extract from University Ordinance XVIII](#AppendixA)

[Appendix B: Case Studies](#AppendixB)

**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.”*

**APPENDIX B: CASE STUDIES**

The case studies below are provided as an illustration of the kinds of interests which may need to be disclosed. If you are unsure whether an interest should be disclosed please discuss with your line manager or contact the ROI mailbox: ROI@manchester.ac.uk

Case Study 1

*I am a member of the University’s Senior Management Team and sit on a number of company and public institution boards.*

You should disclose each board as below:

Organisation: Name of Company

Nature: Board Member (if you are Chair or also on a specific committee disclose this also.

Country: defaults to UK or use the drop down to select a different country if applicable.

Pecuniary/Non-Pecuniary: defaults to Pecuniary (if a paid position) or use the drop down to select Non-pecuniary (if an unpaid position)

Personal/Family: defaults to Personal

Case Study 2

*I am a member of staff in Professional Services. My partner owns their own contracting company and has worked with the University on occasion.*

You should disclose this as below:

Organisation: Name of Company

Nature: Partner of owner

Country: defaults to UK or use the drop down to select a different country if applicable.

Pecuniary/Non-Pecuniary: use the drop down to select Non-pecuniary (provided that you are not being paid by the company yourself)

Personal/Family: use the drop down to select Family

Case Study 3

*I am a member of staff and I also am a Governor at my child’s school.*

You should disclose this as below:

Organisation: Name of School

Nature: Governor

Country: defaults to UK or use the drop down to select a different country if applicable.

Pecuniary/Non-Pecuniary: use the drop down to select Non-pecuniary

Personal/Family: Personal

Case Study 4

*I am a member of academic staff and I also work part-time for a company* that *specialises in my area of research.*

You should disclose this as below:

Organisation: Name of company

Nature: Part-time Employee (if you are at a senior level in the company then please indicate this)

Pecuniary/Non-Pecuniary: Pecuniary (if you are being paid by the company)

Personal/Family: Personal

Case Study 5

*I am a member of staff and also an elected member of my local council.*

You should disclose this as below:

Organisation: Name of council

Nature: Elected Member

Country: defaults to UK

Pecuniary/Non-Pecuniary: use the drop down to select Non- Pecuniary

Personal/Family: Personal

Case Study 6

*I am a member of academic staff and also work as a consultant for a number of companies related to my research*

You should disclose this as below:

Organisation: Name of company

Nature: Consultant

Country: defaults to UK or use the drop down to select a different country if applicable.

Pecuniary/Non-Pecuniary: Pecuniary

Personal/Family: Personal

Case Study 7

*I am a member of research staff and have a project being funded through the National Institutes of Health (NIH). I also have a private consultancy income of more than $5000 annually.*

You should disclose this as below:

Organisation: Name of company

Nature: Consultant

Country: defaults to UK or use the drop down to select a different country if applicable.

Pecuniary/Non-Pecuniary: Pecuniary

Personal/Family: Personal

You should also ensure that you have disclosed this interest on the [*NIH/PHS Funded Annual Declaration of Significant Financial Interests Form*](https://documents.manchester.ac.uk/display.aspx?DocID=24603)