

# 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](#)). This is currently stored in an online system.

## 2. 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](#)).

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. 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](#), 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

## 3. 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.

#### 4. 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	Name of employer and post held
Self-employment	Nature of business
Directorships of commercial companies (including spin-out and dormant companies)	Names of companies
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
Significant involvement with any organisation with which the University does or might do business (if not covered above)	Name of body and nature of involvement
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)	Name of company
Any personal interest in University business or negotiations in which they are involved	Brief details of the personal interest

Any personal interest in the appointment of staff and/or payment of fees and expenses or other personal payments to non-staff	Brief details of the personal interest
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The above list is not exclusive: 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](#) below for more information. [Appendix B](#) 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](mailto:ROI@manchester.ac.uk)

#### 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.** This is in addition to the requirement that outside work is approved by the Head of School (or equivalent). Please see the [Outside Work and Consultancy Policy](#) for further guidance.

Outside work conducted internationally may be subject to further scrutiny. Please see the information on [Export Controls](#) and the [related forms](#) for guidance. For information on consultancy procedures, please see the [Consultancy Services Team](#).

#### 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](#).

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](#).

Wellcome Trust: For funding from the Wellcome Trust you will need to comply with their [policy on conflicts of interest](#).

#### **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.

### **4.2 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.

### **4.3 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 complied with the process but have no interest to disclose.

## **5. 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](mailto:roi@manchester.ac.uk)

Further information is available from:  
[Financial Regulations and Procedures](#)  
[Register of Interests](#)

## **6. Appendices**

[Appendix A: Extract from University Ordinance XVIII](#)  
[Appendix B: Case Studies](#)

## **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](mailto: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.

Pecuniary/Non-Pecuniary: Pecuniary (if a paid position) Non-pecuniary (if an unpaid position)

Personal/Family: 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

Pecuniary/Non-Pecuniary: Non-pecuniary (provided that you are not being paid by the company yourself)

Personal/Family: 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

Pecuniary/Non-Pecuniary: 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  
Pecuniary/Non-Pecuniary: Non- Pecuniary  
Personal/Family: Personal

#### Case Study 6

*I am a member of staff and also work part-time for a family business that has no connection to the University.*

You do not need to disclose this. However, you will need to ensure that you comply with the [University Policy on Outside Work and Consultancy](#).

#### Case Study 7

*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  
Pecuniary/Non-Pecuniary: Pecuniary  
Personal/Family: Personal

#### Case Study 8

*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  
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](#)