

Procedure on Declarations of External Interests

1. General Procedure

On appointment to Newcastle University, or on appointment to a new role within the University, relevant employees (i.e. Executive Board members, Deans and all Heads of Unit as well as any members of staff designated by their Head of Unit) are required to make a declaration of external interests, in which they must specify any external interests *or* confirm that they do not have any external interests. Guidance on 'relevant employees' can be found in Appendix C.

Heads of Unit have a duty to inform all staff designated as relevant employees for the purposes of this policy and each staff member's line manager. Heads of Unit are responsible for ensuring an appropriate record is kept as to which staff have been designated as relevant employees within their unit.

The declaration should be made through the Declaration of External Interests section in MyImpact (<https://myimpact.ncl.ac.uk> – see the personal information tab for detailed instructions), within the first two weeks of appointment of relevant employees. The line manager will review the interests of the employee at their induction.

From the start of their employment onwards, relevant employees are required to declare and discuss any new external interests, changes to existing external interests and any new potential conflict(s), with their line manager, before pursuing or continuing the external interest. If approved by their line manager, they must update their Declaration of External Interests section in MyImpact, as soon as the interest is approved.

The line manager must determine if any external interest raises a potential/actual conflict of interest and, if so, whether the external interest should be permitted and how the conflict would be managed. Any decision made must comply with the Policy on Declaration of External Interests.

Where there is any uncertainty as to whether an external interest should be permitted the line manager must liaise with the relevant Professional Service lead eg Director of Business Development & Enterprise, Director of Research Strategy & Development, Head of Procurement or Director of Faculty Operations as appropriate in order to ensure that an informed decision is made.

If permitted, a record of the external interest(s) and of the decisions reached must be retained through completion of the 'Agreed Actions' field of the Declaration of External Interests section in MyImpact. This should be completed by the employee, following the discussion with their line manager.

If there is a change to an existing external interest or if a potential conflict arises, the employee must notify and seek further approval from their line manager as soon as any such change arises. Again, if permitted, a record of the conflict and of the decisions reached must be retained, through completion of the 'Agreed Actions' field of the Declaration of External Interests section in MyImpact. The line manager should review external interests with the employee on an annual basis, ideally at the same time as the PDR for employees.

2. Procedure for University Decision-Making Processes, Committees or Meetings

Before engaging in any University decision-making processes, committees or meetings, employees and lay members of governance committees i.e. Council and Senate, and their designated sub-committees, and other advisory boards as directed by the Registrar, are required to declare any

external interest(s), which might be, or in the reasonable opinion of others might be perceived to be, in conflict with the process or decision to be undertaken or considered.

The declaration should be made by either:

- (i) contacting the Named Person in writing, ahead of any meeting/discussion, or
- (ii) stating the external interest(s) before any decision-making is discussed.

Employees and lay members of Governance Committees should provide accurate and sufficient information.

The Named Person must determine whether the employee/lay member should continue to be involved.

Employees should have updated the Declaration of External Interests section, including the 'Agreed Actions' field (following a discussion with their line manager), in MyImpact, as soon as the external interest arose. The Named Person may request to review this record when making their decision. The Named Person should notify the employee as to whether they are permitted to continue in the process, by either replying to the employee in writing or stating the decision at the meeting.

When notifying the employee/lay member, the Named Person should specify any potential/actual conflict(s) of interest raised by the external interest(s), their reasons for permitting or not permitting the employee/lay member to continue their involvement and, where a potential/actual conflict is raised and permitted, how the conflict will be managed.

A record should be retained of the correspondence and stored in line with Newcastle University's Data Retention Policy.

Where the Named Person has any external interest(s) to declare, the procedure is the same, except that the Named Person should contact the other members, and it is the other members that determine whether the Named Person should continue to be involved in the process, committee or meeting.

3. Procedure for Monitoring and Reporting on Compliance

Heads of Unit will receive a biannual report identifying all employees in their unit and the date of their last declaration.

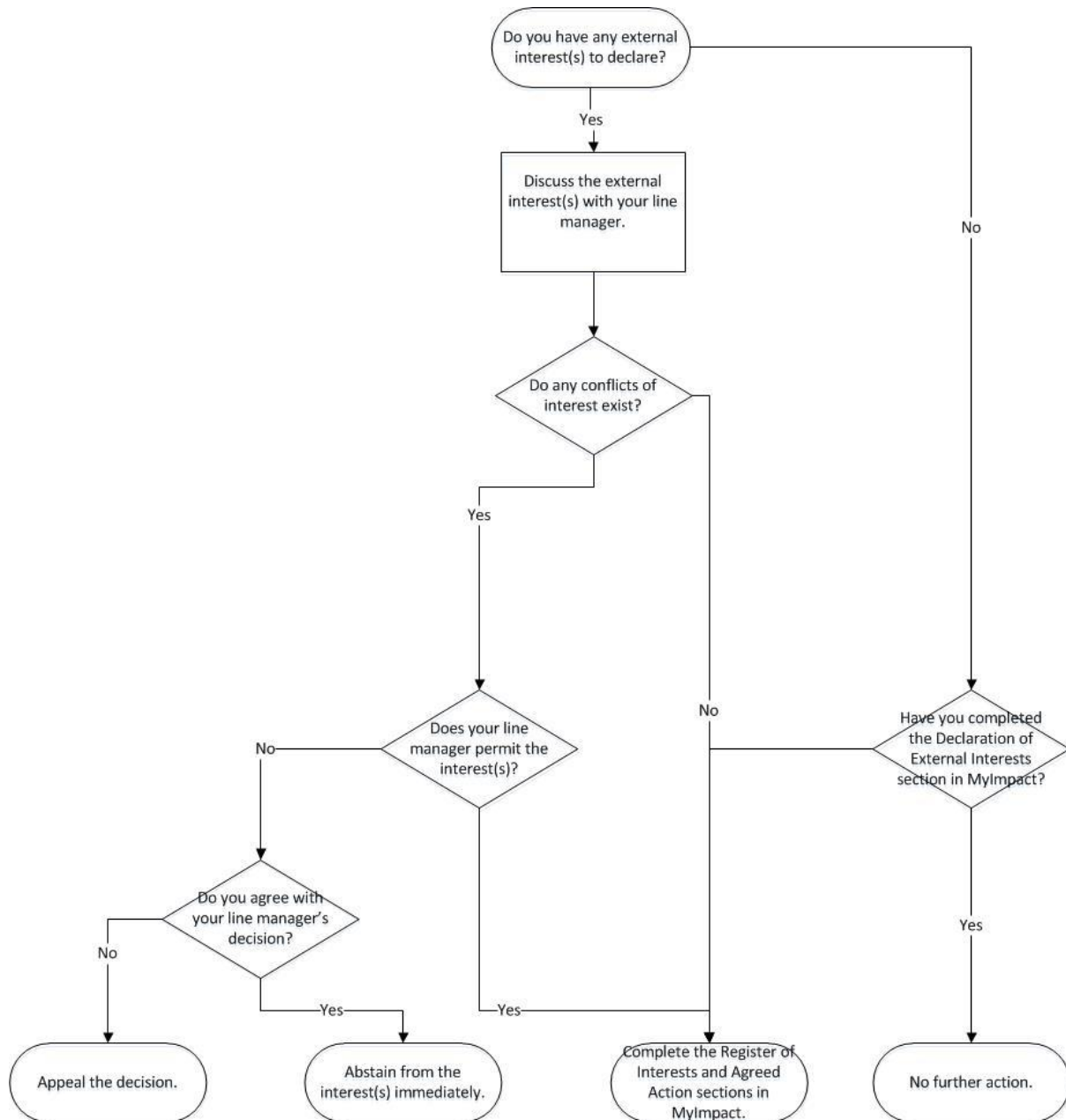
Heads of Unit must review the report to check that every relevant employee has made a Declaration of External Interest (specifying any external interests or confirming that they do not have any).

Professional Service leads, specifically the Director of Business Development & Enterprise, Director of Research Strategy & Development, Head of Procurement and Directors of Faculty Operations will be permitted to access staff information relating to external interests where there is a business need.

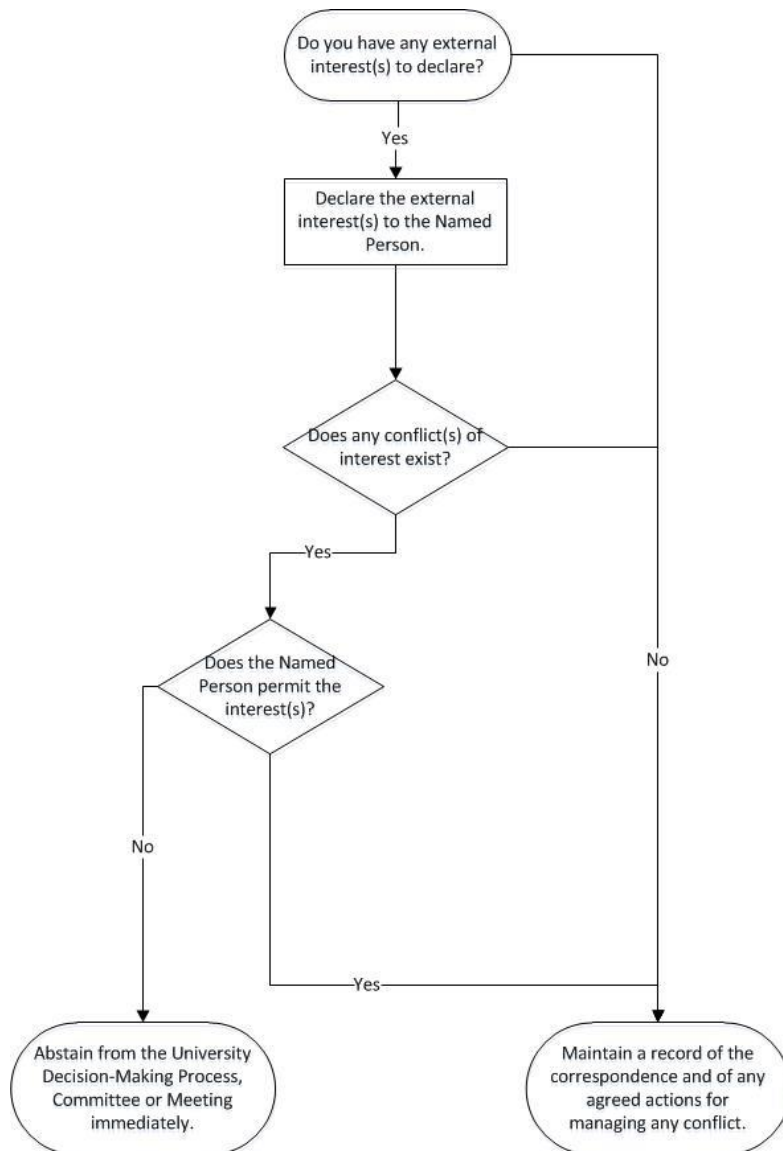
Heads of Unit should check that the line managers in their unit are aware of any external interests declared by their employees, check that any information entered into the 'Agreed Actions' section is accurate, and notify the line managers of any employees that have not completed their Declaration of External Interest Record. Dipstick audits will also be carried out as appropriate.

David Hill
Director of Research Strategy and Development
December 2018

Appendix A: Declarations of External Interests Flowchart for Relevant Employees



Declarations of External Interests Flowchart for University Decision-Making Processes, Committees or Meetings



Appendix B: MyImpact Declaration of External Interests

Declaration Statement

I have reviewed my listing of external interests. By clicking 'Confirm' below, I declare that the listing is complete and accurate as of (DATE) and that:

- *Where external interests are listed:*
 - I have discussed any external interests listed with my line manager.
 - To the best of my knowledge, I have notified my line manager of any potential/actual conflict(s) of interest that may arise due to the external interest(s) listed.
 - My line manager has permitted the external interest(s) listed below.
 - Any agreed actions for managing any potential/actual conflict(s) of interest have been entered accurately in the 'Agreed Actions' section below.
- *Where no external interests are listed:*
 - I have no external interests to disclose.

Listing of External Interests

External Organisation / Interest Type / Details / Applicable From / Applicable To

Line Manager

Please enter the name of the line manager with whom you have discussed any external interests listed above.

Agreed Actions

Please detail below any agreed actions for how any conflicts will be managed.

Appendix C: Relevant Employees

All staff should avoid placing themselves in a position of having or appearing to have a declaration of interest that is not managed appropriately. The specific procedures outlined above apply to:

- University Executive Board members
- Deans
- all Heads of Units
- Any members of staff designated by their Head of Unit
- Any member of staff not included in the groups above but who declares an external interest

Depending upon the Unit, it may be appropriate for the Head to require all staff to comply with the policy however, in those cases where it is appropriate for the Head of Unit to be selective, the University requires the role of each staff member to be considered. As a minimum, the University requires staff to comply with the policy if their role includes any of the following activities:

- Involvement in any form of commercialisation
- Involvement with external organisations that might form a trading relationship with the University
- Any procurement involvement
- Acting as a representative of the University
- Sales involvement

For further guidance please contact: RES.policy@ncl.ac.uk