

## Declarations & Conflict of Interests Policy

Policy No.	P2223-551	Review Interval:	Annual
Effective Date:	February 2023	Review Date:	July 2024
Last Revised:	February 2023	Approval Body:	SLT
Policy Owner:	Director of Human Resources		
Policy Author:	HR Head of Compliance, Policy & Governance		

### Purpose

This Declarations and Conflicts of Interests Policy and accompanying procedure, provide a framework to require all individuals in scope acting on behalf of the University to declare any interests, either actual or potential, in order to avoid conflicts of interests between their roles within the University and any activities undertaken outside of their position within the University, and to provide a process for any potential conflicts to be considered, resolved and/or mitigated.

### Scope

This Policy applies to all individuals acting on behalf of the University, such as members of staff (including honorary and visitor appointments), members of Council and Trustees of the Swansea University Pensions Scheme, including potential staff during the recruitment process.

Student focused roles, including Teaching Assistants, Student Demonstrators and Student Ambassadors are excluded from the scope of the policy. A full list of excluded roles is included in the associated Procedure and Guidelines.

### Key Principles

All individuals in scope acting on behalf of the University:

- ◆ Must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- ◆ Should act and take decisions in an open and transparent manner. Information should not be withheld unless there are clear and lawful reasons for doing so.
- ◆ Should act solely in terms of the University's best interests.
- ◆ Must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work.
- ◆ Must not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any potential interests and relationships, prior to entering into them.
- ◆ Are accountable to the University for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

All individuals in scope acting on behalf of the University are required to declare any interest, actual or potential, in order to avoid conflicts of interests and to protect the University. This Policy requires a three stage approach:

- ◆ Disclosure - There must be immediate disclosure by any individual in scope acting on behalf of the University of any actual or potential interest as and when they arise in order to avoid perceived or potential conflicts of interests.
- ◆ Full consideration of declared interests with any declaration by the relevant Authorising Officer, as defined in the procedure, and
- ◆ Where possible, agreed action to manage/mitigate any identified conflicts of interest.

## Policy Development Checklist

I confirm that the above policy:

Is legally compliant	<input checked="" type="checkbox"/>
Fits with current University Strategy	<input checked="" type="checkbox"/>
Has had an approved <a href="#">Equality Impact Assessment</a> : <ul style="list-style-type: none"> <li>• Does not have adverse effects on opportunities for persons to use the Welsh language</li> <li>• Does not treat the Welsh language less favourably than the English language</li> </ul>	<input checked="" type="checkbox"/>