

Conflicts of Interest Policy

V2.0 – 27 July 2026

1. PURPOSE

As an institution in receipt of public and other funds, UWE Bristol has a duty to fulfil, and is committed to maintaining, the highest standards of corporate governance. Everyone associated with the University should conduct themselves with integrity, impartiality and honesty at all times.

UWE Bristol recognises that members of its university community will have many outside interests and contacts within the local, national and international communities, which benefit the University in the achievement of its ambitions. The University welcomes such interests as enhancing the richness of experience that staff, Governors and those working on behalf of the University bring to their role.

From time to time, however, they may give rise to conflicts of interest, whether actual or potential, of a financial or other nature.

This policy:

- Provides guidance in areas where an outside interest or relationship may raise a conflict of interest with an individual's role with UWE Bristol;
- Sets out the requirements for declaring and recording such interests; and
- Sets out the process for managing conflicts.

This policy and its associated requirements should be referred to in parallel with the University's Financial Regulations and Personal Relationships at Work Policy.

2. SCOPE OF THE POLICY

This policy applies to all UWE Bristol employees, members of the Board of Governors, contractors, external examiners, agency staff, post-graduate research students, visiting academics, and others working on behalf of the University.

All those in scope will be made aware of this policy and their specific obligations through induction processes or on being engaged by the University.

Conflicts that are properly managed generally enable activities to proceed as normal whilst protecting the integrity and reputation of the individuals and the University. Conflicts which are not managed effectively risk harming the integrity and reputation of the University and of the individuals concerned. As an organisation which seeks to collaborate with external partners, it's essential for UWE Bristol to maintain trust and credibility with all stakeholders.

A breach of this Policy may lead to investigation under the University's disciplinary procedures.

This Policy applies in addition to, and does not in any way replace, the requirement for members of staff to seek permission to undertake certain activities as part of or in addition to their usual job role (see External Work Policy and Guidelines for

Academic Staff - <https://intranet.uwe.ac.uk/tasks-guides/Policy/external-work-guidelines-for-academic-staff>).

3. IDENTIFYING A CONFLICT OF INTEREST

A conflict can occur when the duties owed to UWE Bristol by members of the university community, or those engaged in work on behalf of the University, compete with their personal interest, personal relationships or duties to others. This can include situations where the commitments and obligations owed to the University or to other bodies, for example a funding body, are likely to be compromised or may appear compromised by:

- Personal gain, or gain to immediate family (or a person with whom the member of staff has a close personal relationship), whether financial or otherwise; or
- The commitments and obligations that the member of staff owes to another person or body.

A conflict can be actual, potential or perceived. A perceived conflict of interest is one which a reasonable person would consider likely to compromise objectivity. A potential conflict of interest is a situation which could develop into an actual or perceived conflict of interest. A conflict of interest may be financial or non-financial, or both.

If a person within the scope of this policy is unsure about whether a particular situation amounts to a conflict of interest (actual or potential), they should disclose that situation.

It is not possible to draw up an exhaustive list of qualifying interests, although examples are given in Annex A to assist with identifying interests covered by this policy.

It is also contrary to this policy for employees to exercise any opportunity arising from their position at UWE Bristol to the disbenefit of the University, its students or statutory purposes. All employees are legally obliged to act in the best interests of their employer, which includes keeping the University's assets, opportunities, resources and goodwill for the benefit of the University's statutory purposes (the provision of higher education and the conduct of research), as required by charity law. Members of the Board of Governors owe the same duty to the University as their role is one of trusteeship.

4. DISCLOSING A CONFLICT OF INTEREST

Those listed below are required to submit a mandatory annual declaration listing or confirming all situations in which they have a conflict of interest (actual, perceived or potential), or confirming that there are no such situations:

- All academic and research staff.
- Members of staff who have declared an interest in accordance with the general procedures below during the previous academic year.
- All members of staff working in Procurement and at Grade G and above in Estates and Facilities.
- Members of the Vice-Chancellor's Executive.
- Members of the University's Board of Governors.

Those listed above must disclose to the University any situation in which they have identified a conflict of interest (actual, perceived or potential) as soon as possible after identifying the conflict of interest.

A member of staff shall make their disclosure to their people manager who will determine whether this should be escalated further within their School, College or Professional Service, or through to the Head of School, Head of College or Professional Service lead. The initial disclosure will be through completing a Conflicts of Interest Disclosure Form in UWE Bristol's people management system.

All other university employees, contractors, external examiners, agency staff, post-graduate research students and others working in the University as visiting academics, are encouraged to make a declaration should such a situation arise. The University's Board of Governors are reminded annually of the Code of Conduct for Members, which sets out the requirement to declare any personal or business interests which may conflict with their responsibilities to the University. These are included on the Register of Interests. The Register of Interests is reviewed and confirmed through a survey of interests each year. This is carried out by the Governance Office, with Governors required to provide any changes as they occur within the year.

In addition to the above, checks are made prior to nomination for external examiners. These checks confirm whether any UWE Bristol staff have external examiner appointments at the institution of the potential nominee, which could lead to perceptions of reciprocal arrangements. During the nomination process, potential external examiners are asked to declare any current or previous associations with UWE Bristol staff or students in the last five years. If a potential conflict is declared, this will be investigated by the Academic Quality and Partnerships Enhancement Team to determine if the conflict can be managed. This information is captured in the External Expertise Service system. If the conflict cannot be managed, no appointment is made. Where appointed, external examiners are requested to notify the University of any changes in their interests, for example a change in employer, which is then reviewed through the Academic Quality and Partnerships Enhancement Team.

For Independent Assessors for Degree Apprenticeship programmes, confirmation of independence is also sought during the nomination process, with further checks performed to provide assurance.

Conflicts of interest must also be declared in relation to any involvement in subcontracted or franchise partnerships, including approval, monitoring, or review of delivery partners.

Requirements of external parties relating to conflicts of interest

Members of staff also need to be aware of and comply with any applicable requirements of external parties in relation to conflicts of interest, for example:

- Some funders (e.g. Cancer Research UK), require notification to them of certain conflicts of interests.
- Members of staff sitting on committees or boards will need to comply with the conflicts of interest policy of that committee or board.

If a member of staff is unsure whether there are any external party requirements which affect them in relation to their activities, they should seek advice from their people manager.

5. MANAGEMENT OF A CONFLICT OF INTEREST

The relevant Professional Service lead, Head of School, or Head of College will evaluate any disclosure made by a member of staff and may decide either that:

- Disclosure of the conflict is sufficient; or
- Additional measures may be required to manage the conflict in order to protect the University and/or the member of staff.

If the relevant Professional Service lead, Head of School or Head of College is subject to the same conflict situation, they shall refer the situation to their line manager.

In cases where the relevant Professional Service Director, Head of School or Head of College has decided that additional measures may be required to manage the conflict, they will decide on the appropriate measures to be taken following discussion with the member of staff. The discussion with the member of staff shall take the form of a 'Conditions Statement'.

The Conditions Statement will detail the conflict of interest, any additional actions to be taken and will include a suitable review date. This information will be kept on file for as long as the conflict of interest exists.

Additional measures that may be required to manage the conflict, could include:

- The member of staff not taking part in university discussions in a Procurement process or meetings about the matter causing the conflict;
- The member of staff not being responsible for university decisions regarding the matter;
- The member of staff not signing any contract on behalf of the University regarding the matter;
- Including a notice of the conflict in any publications relating to the matter; and/or
- In limited cases, where the conflict is severe, restricting one or other of the member of staff's conflicting activities.

In reaching a decision, the Professional Service lead, Head of School, or Head of College may (but is not required to) consult with the Vice-Chancellor's Executive, People and Organisation Development and/or Research, Business and Innovation.

The Professional Service lead, Head of School, or Head of College is expected to reach the decision without further escalation.

Decisions of the Professional Service lead, Head of School, or Head of College will be recorded in the conflicts of interest annual report (see section 6 below) with a review date set.

Members of staff are required to comply with any additional measures put in place to manage the conflict of interest and failure to comply may result in disciplinary action.

Any member of staff who is concerned that another member of staff may have an undisclosed conflict should raise this with the individual's line manager.

Oversight of the robust operation of UWE Bristol's framework for managing conflicts of interest is through the University Ethics and Integrity Committee.

6. REPORTING OF INTERESTS

Information provided by members of staff regarding conflicts of interest under this Policy and any measures required in relation to conflicts of interest will be recorded in the annual report of interests, held in UWE Bristol's people management system.

A Register of Interests relating to members of the University's Board of Governors and Vice-Chancellor's Executive is held through the Governance Office and may be made available under the University's Publication Scheme. Details of interests for each Member of the Board of Governors are also published on the University's Governance webpages: <https://www.uwe.ac.uk/about/structure-and-governance/governance-and-management/board-of-governors>

Extracts of the register and annual report of interests relating to other members of staff may be subject to disclosure in response to requests for information under the Freedom of Information Act 2000. The University will consider whether there are any applicable exemptions to disclosure under the Act when responding to any such requests.

7. RELATED POLICIES

UWE Bristol's Conflicts of Interest Policy is written within the broader context of the University's procedures and policies, and must be considered alongside these, including but not limited to:

- Anti-Bribery Policy.
- Corporate Ethics Policy.
- Dignity at Work Policy.
- Financial Regulations.
- Gift and Hospitality Register and Guidance.
- Intellectual Property and Knowledge Transfer Guide.
- Personal Relationships at Work Policy.
- Procurement Policy.
- UWE Bristol Code of Good Research Conduct and Policy.

8. APPEALS PROCESS

An appeals process is available for members of staff. If a member of staff disagrees with any decision made under this Policy in respect of a conflict situation affecting them, in the first instance they should raise this informally with their people manager as soon as possible.

If this does not resolve the situation, they can submit a formal appeal. The appeal must be submitted in writing, setting out the grounds of the appeal within ten working days of the receipt or notification of the decision. The appeal should be sent to the manager who made the original decision. They will advise HR of the appeal and discuss the appointment of a senior manager to hear the appeal.

Any appeal should relate to:

- Information becoming known that was not available at the time they made their original decision.
- If the member of staff reasonably believes the situation was not handled reasonably or in line with this policy.

Any appeal should be heard by a more senior manager within the current College/Professional Service, or where this is not possible, from another College/Professional Service where the manager would be familiar with the operation of that area.

A meeting with the employee to hear the appeal should be held within ten working days of the receipt of the written appeal. The employee has the right to be accompanied by a fellow employee or trades union representative.

The manager hearing the appeal will consider representations on both sides before reaching a decision. That decision will be final and should be notified in writing to the employee within five working days of the meeting.

ANNEX A - EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST

This list is not exhaustive and members of staff should consider their own particular circumstances. Members of staff should ask themselves if others (e.g. managers, students, customers, colleagues, members of the public) would trust their judgement if they were in possession of the facts of the interest: could others reasonably conclude that it might influence the member of staff to act other than in the interests of UWE Bristol? Advice may be sought from a people manager in the first instance.

A close relative or immediate family can be defined as: spouse, civil partner, or a financial dependent. However, the 'close personal relationship' giving rise to an interest could extend to the following (this is not intended to be an exhaustive list): unmarried partner, parent, all children, siblings, grandparent, grandchild, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, daughter-in-law, the (unrelated) child of an unmarried partner, as well as half and step members of family.

Examples

The member of staff, or their spouse, partner, close relative or business partner has interests such as:

- Business position such as Directorships, including non-executive directorships of, or employment by, public or private companies likely or possible to seek to do business with UWE Bristol.
- Significant shareholdings in public or private companies or ownership or part-ownership of or employment by businesses or consultancies likely or possibly seeking to do business with UWE Bristol.
- Any other personal or financial interest (including shareholding) in a company or other organisation with which UWE Bristol is negotiating or holds a contract or is engaged in any other business transaction.
- Remunerated or honorary positions and other connections with HE institutions which may give rise to a conflict of interest.
- Ownership or part ownership or other interest in property for rent or lease in the vicinity to UWE Bristol.
- Representational or other non-financial interests in areas covering the University (e.g. election as a Councillor or MP for a ward including all or part of the University).
- A personal financial interest (e.g. licence income) in a university activity.

- Membership of an external committee or body whose work may relate to that of UWE Bristol (for example, committees or bodies set up by research councils, other funding bodies, school boards, government departments, NHS trusts).
- Involvement in the provision of university services (for example, where a member of staff is the parent of an applicant to a course and would be responsible for admission decisions for that course):
 - Has or develops a close personal relationship with a student or member of the family of a student for whom they have responsibility for grading work.
 - Is investigating a potential disciplinary matter or develops a close personal relationship with a student involved in the investigation or a member of that student's family.
 - Has a spouse or partner who is also a member of staff at the University, in cases where they may work together on matters affecting the University's business.

Highlighted below are some common instances where conflicts of interest might arise; members of staff may find these useful as illustrative examples. However, conflicts of interest can manifest themselves in a wide variety of different ways, and it is not possible to account for every situation:

- An academic is providing consultancy for an external organisation whilst at the same time supervising a PhD student. If the student becomes involved in the work relating to the consultancy contract, this creates a potential conflict of interest for the supervisor and potentially the student, which must be declared and managed effectively.
- An academic wishes to undertake consultancy in their private time in a field related to their academic work for the university. The university already offers consultancy in this field and has a number of good clients who are known to the academic.
- An academic is a Director of a company which develops and delivers new interventions to improve integration of children with special needs into mainstream education. The academic proposes a joint bid with the university to a charitable funder for funding which might lead to new products and services which could be commercialised by their company.
- A researcher is facilitating a clinical trial of a therapeutic agent which is being developed by a spin-out company – a company which the researcher helped to establish and now has a financial interest in as a shareholder. Although the researcher may be the only person with the necessary expertise to carry out the clinical trial effectively, it nevertheless represents a conflict of interest that must be declared and managed by the researcher who must remove themselves from the decision-making process.
- A manager may need to procure specialist equipment or services to deliver a project. If the manager's partner sits on the board of a company that is being considered in the tendering process that creates a conflict of interest which must be declared. It does not disqualify the company, but

as part of the Conflict Management Plan, the manager in question must extricate themselves from the selection process. This is often perceived as being a complex area; but if there is any doubt in a situation then disclosure is the recommended initial course of action.

- A contract manager manages a substantial contract for facilities management services. The contract manager forms a personal attachment with the account manager of the service provider.

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