1. Guidance

1.1. The purpose of the Declaration of Interests policy is to ensure that all UKRI employees and non UKRI employees are aware of their responsibilities to declare and manage any potential conflicts of interest, using the relevant guidance and tools provided. The following guidance and frequently asked questions provide essential detail for UKRI employees and non UKRI employees, including board and committee members. There is separate guidance for assessors of funding applications.

1.2. Accessibility and inclusion
UKRI is committed to promoting equality and to ensuring our Declarations of Interest Policy and process is fair and accessible to all users. We welcome and encourage you to contact conflictsofinterest@ukri.org with any feedback, queries or concerns.

2. Roles and Responsibilities

2.1. Employees and non UKRI employees (as defined in the policy statement) are responsible for ensuring that their declarations are always kept up to date. Disclosures should only be required where interests are, or could be perceived as, relevant to the role and responsibilities of the individual.

2.2. Interests should be sought and declared upon appointment to UKRI1 and updated by the individual when circumstances change. If an individual finds themselves in the position where they have, or could be perceived to have, a conflict of interest they should declare it immediately.

2.3. Interests should be declared as and when they arise rather than intermittently when prompted by a responsible manager, UKRI Deputy Director Risk and Assurance (DD RA), HR, or Secretariat.

2.4. The process for handling Declarations of Interests differs depending on the individual's role, refer to Table 1 – Roles and Responsibilities.

2.5. As soon as a declaration has been disclosed, the initial assessment must take place and mitigating actions agreed if required.

2.6. Individuals assessing a manual disclosure form must send the signed disclosure form to the team responsible for record keeping, as per Table 1 – Roles and Responsibilities (below).

---

1 For contractors, including Monitoring Service Providers, this means each time they are engaged to undertake work for UKRI.
2.7. Each Council or UKRI Central Services Directorate will be responsible for recording interests, reviewing, managing and mitigating conflicts within their respective teams throughout the year.

2.8. Each Council or UKRI Central Services Directorate will update the register and notify the UKRI DD RA, either annually, or, by exception, when there are new appointments or if new interests arise and the Council Executive Chair or the UKRI Central Services Director have concerns or require advice from the DD RA.

2.9. The following employees and non UKRI employees shall be required to review, update and disclose interests relevant to their role and responsibilities annually, or as soon as interests change:

- non-executives, including members of the UKRI Board, associated Committees and Councils
- UKRI Executive Committee members
- individuals in positions that exercise significant financial control or those involved in decision making processes (examples include recruitment and those involved in procurement and contract management)
- all employees UKRI band G (or equivalent), and above
- employees who intend to apply for, or are in receipt of UKRI funding

<table>
<thead>
<tr>
<th>Role</th>
<th>When to submit a declaration:</th>
<th>Person responsible for assessment:</th>
<th>Responsible for record keeping:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-executives, including members of the UKRI Board, associated Committees and Councils</td>
<td>Annually or by exception</td>
<td>Chair of the relevant Board or those with delegated authority</td>
<td>Secretariat / Local Governance Team</td>
</tr>
<tr>
<td>UKRI Executive Committee members</td>
<td>Annually or by exception</td>
<td>Council Senior Independent Member (SIM) or those with delegated authority</td>
<td>Secretariat</td>
</tr>
<tr>
<td>All employees UKRI band G or equivalent and above</td>
<td>Annually or by exception</td>
<td>Line Manager in consultation with the UKRI DD RA or Executive Chairs as appropriate</td>
<td>UKRI Internal Controls or Council Governance Team</td>
</tr>
<tr>
<td>Employees who intend to apply for, or are in receipt of UKRI grant funding</td>
<td>By exception</td>
<td>Line Manager</td>
<td>UKRI Internal Controls or Council Governance Team</td>
</tr>
<tr>
<td>Individuals in positions that exercise significant financial control or those involved in decision making</td>
<td>Annually or by exception</td>
<td>Line Manager</td>
<td>UKRI Internal Controls or Council Governance Team</td>
</tr>
</tbody>
</table>
3. Declaring and Managing Interests

3.1. Where relevant to their role and responsibilities, UKRI employees and non UKRI employees are required to complete a Declaration of Interest form (see Appendix 1) and send to the responsible individual (as detailed in Table 1). UKRI has implemented a self-service DOI portal to support this process. UKRI employees and specific groups of non UKRI employees will have access. Anyone with access should use this portal to make a declaration. Those without access will need to declare using a manual form, more information can be found in Appendix 1.

3.2. Where an individual’s role and responsibilities require them to complete a declaration, but no relevant interests exist, a declaration should be submitted stating “nil return”.

3.3. Declarations should be assessed (as detailed in Table 1) to determine whether any conflict exists and whether any action is required to mitigate risk exposure. All decisions should be recorded. The individual assessing the disclosure is accountable for ensuring that any conflicts of interest are mitigated and for sending any manual forms to the appropriate team that is responsible for record keeping.

3.4. If the individual assessing the disclosure determines that an actual, potential, or perceived conflict of interest exists, they will work together with the individual to implement an agreed course of action to manage the conflict. An example of a mitigation plan can be found in the Frequently Asked Questions at Appendix 3.

3.5. If during the assessment, any interests are declared, and actions identified, they should be revisited regularly, at least annually by both the individual making the declaration and the individual responsible for assessing, escalating to DD RA where required. More frequent updates may be requested as necessary, in particular where impacted events occur e.g., renewal of contracts. Copies of all registers will be retained permanently as per the UKRI Retention Schedule.

3.6. When a declaration is considered to identify a high-risk conflict of interest, UKRI will carry out further investigations to determine the exact nature of the relationship and its impact on UKRI’s operations and reputation. Such investigations might include:

- discussions with the individual concerned
3.7. This process is managed by the DD RA (see Appendix 2) who is responsible for maintaining a central combined UKRI register of interests. Each Council or UKRI Central Services Directorate will ensure all declarations in their designated areas are reviewed and assessed annually (prior to the end of the financial year) and recorded on the DOI Portal. They will notify the DD RA at conflictsofinterest@ukri.org when this exercise is complete.

3.8. UKRI will publish (make available on the UKRI web site) declarations of interests of all Board members and Executive Committees members. Councils will also publish (make available on the UKRI web site) declarations of interests of all Executive Board members, Committee members and Council members.

3.9. Each year, the Internal Controls team will complete a random check of declaration records to ensure compliance with the UKRI Policy. A report on the findings will be provided to the DD RA.

3.10. Each Council and the UKRI Central Services Directorates should monitor their registers throughout the year, not just for the purpose of the above exercise.

4. Examples of when to declare an interest

4.1. Outlined below are examples of a range of situations where there could be (or could be perceived to be) a conflict of interest relevant to an individual's role and responsibilities with UKRI:

4.2. Financial Interests – An individual may receive a direct financial benefit from the consequences of the awarding of funding, for example:
   • a director, including a non-executive director, or senior employee in an organisation which is, or which is likely, in receipt of funding or possibly seeking to obtain funding
   • a shareholder (or someone with similar ownership interests), a partner or owner of a private or not-for-profit company which is, or is likely to seek, or obtain funding
   • a shareholder or UKRI related start up
   • a management consultant for a business/individual
   • in receipt of secondary income from a business/individual
   • in receipt of any payments (for example honoraria, one-off payments, day allowances or travel and subsistence) from an organisation possibly seeking to obtain funding

4.3. Indirect financial interests – An individual may have a close association with an individual who has a financial interest in a commissioning decision (as those categories are described above) for example:
   • spouse / partner
   • close relative (e.g., parent, grandparent, child, grandchild, or sibling)
   • close friend
   • business partner
   • a financial relationship (e.g., pension) with a business/individual seeking to obtain funding

4.4. Non-financial professional interest - An individual may obtain a non-financial professional benefit from the consequences of a funding award, such as increasing their professional reputation or status, or promoting their professional career. This may, for example, include
situations where the individual is:
• an advocate for a particular group
• a member of a particular specialist professional body

4.5. **Non-financial personal interests** – An individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit. This could include, for example, where the individual is:
• a voluntary sector champion for business / individual
• a volunteer for business / individual
• a member of a lobby or pressure group with an interest in research or development

4.6. **Indirect interests** – An individual may have a close association with an individual who has a non-financial professional interest, or a non-financial personal interest in a commissioning decision (as those categories are described above) for example, a:
• spouse / partner
• close relative (e.g., parent, grandparent, child, grandchild, or sibling)
• close friend
• business partner

4.7. **Roles with heightened risk in relation to perceived conflicts of interest**

In the list below we have provided some guidance on roles that have a perceived higher risk factor in relation to perceived conflicts of interest. In these roles a form should be completed even if no perceived conflict exists (such as a nil return):

• procurement – particularly those roles responsible for administering tenders, supplier decisions and contract terms
• grant awards – particularly those administering and supporting grants panels
• contracting – including those determining contract terms or financial terms, particularly in relation to estates contracts and commercial contracts
• Board and Council appointments – particularly those in administering and supporting Boards or Councils.

This list should not be perceived as exhaustive, if other specific roles exist that have a perceived higher risk factor, then a declaration should be submitted (including declarations of “nil return”).

5. **Appendices**

5.1. **Appendix 1: Declaration of Interest Form**
5.2. **Appendix 2: Process Flow Chart**
5.3. **Appendix 3: Frequently Asked Questions (FAQ’s)**
# Appendix 1: Declaration of Interest Form

This form is for use by individuals who do not have access to the self-service DOI Portal. Those who do have access, should **not** use this form but make their declaration via the DOI Portal.

<table>
<thead>
<tr>
<th>Details (examples, not limited to) - N/A or none should be added to any fields which are not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
</tr>
</tbody>
</table>
| Primary Role/Post with UKRI | Job title  
Council, Board, Committee member  
Non-Executive Director |
| Other Roles/Services provided to UKRI in addition to primary role | Advisor  
SRO  
Member on alternative Board |
| Professional memberships or affiliations | Fellow  
Member  
Honorary Professor |
| Appointments, Employment, Directorships, and consultancies with other organisations | Full time role  
Chair of a Board  
Board member  
Non-Executive  
Director of organisation  
Professor at a University |
| Roles in organisations receiving UKRI support where you receive Remuneration/Benefits in kind/other income received. | Advisor  
Non-Executive Director  
Committee member  
Council member |
| Unremunerated involvement with relevant bodies | Advisor  
Member of advisory group  
Board Observer |
| Direct investments (shareholdings, dependencies and/or other financial interests) | Shareholder of a company  
Pension investment |
| Direct investments in organisations receiving UKRI funding and/or support | Shareholder of a company  
Pension investment |
| Financial, pecuniary, and non-financial links of immediate or close family members in above areas | Immediate or close family member employed by organisation or attending university receiving UKRI funding and/or support |

I confirm that, to the best of my knowledge:
(a) the information contained in this declaration is complete and accurate; and
(b) I am not aware of any conflicts, other than those contained in this declaration, that exist between my role, UKRI and my personal or other interests, or those of my immediate or close family.

I undertake to:

(a) update this declaration as and when my circumstances change;
(b) declare promptly any conflict that arises in the future; and
(c) undertake any conflicts management plan put in place in relation to the interests in this declaration.

I understand that by failing to make full, accurate and timely declarations, or failing to abide by any conflicts management plan, my conduct may be subject to disciplinary proceedings and/or investigations that may lead to civil proceedings or a criminal prosecution.

Print name……………………………………………………….
Signature…………………………………………….…………….
Date…………………………………….

Line Manager / Responsible manager¹ assessment:
(Please mark X where appropriate)

☐ I confirm that I am the line manager / responsible manager for the person associated with this declaration.

☐ I have assessed the declared interests and have not identified an existing conflict.

(or)

☐ I have assessed the declared interests and identified the following conflicts and will take the following mitigating action:

<table>
<thead>
<tr>
<th>Conflict of Interest</th>
<th>Mitigating action (where appropriate)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Print name……………………………………………………….
Signature…………………………………………….…………….
Date…………………………………….

Line Manager / Responsible manager¹, to send the completed form to the relevant team / individual responsible for record keeping¹.

¹ As detailed in the UKRI Declaration of Interests: Guidance for employees and non UKRI employees, including board and committee members
Appendix 2: Process Flowchart

- Non-executives, including members of the UKRI Board, associated Committees and Councils
- UKRI Executive Committee members
- All employees UKRI band G or equivalent and above
- Employees who intend to apply for, or are in receipt of UKRI grant funding
- Others in positions of significant financial control or high-risk activities

Employees / Non-employees

- Complete Declaration of Interest
- Submit to individual responsible for initial assessment
- Review declaration, manage and mitigate any conflict
- Submit any manual declaration forms to team responsible for record keeping
- Maintain register of declarations
- Publish register on UKRI website
- Inform DD RA when annual review of declarations is complete
- Ensure updated registers are published at least annually for Board members, Executive Committees members and Council members

All other employees and non UKRI employees

- Complete Declaration of Interest
- Submit to individual responsible for initial assessment
- Review declaration, manage and mitigate any conflict
- Submit any manual declaration forms to team responsible for record keeping
- Maintain register of declarations
- Publish register on UKRI website

Individual Responsible for assessment

- By exception

Team responsible for record keeping

- By exception

DD RA

- By exception

Annually

By exception

Complete Declaration of Interest

Complete Declaration of Interest

Submit to individual responsible for initial assessment

Submit to individual responsible for initial assessment

Review declaration, manage and mitigate any conflict

Review declaration, manage and mitigate any conflict

If high-risk conflict identified inform DD RA

If high-risk conflict identified, revisit regularly, at least annually

If high-risk conflict identified inform DD RA

Submit any manual declaration forms to team responsible for record keeping

Submit any manual declaration forms to team responsible for record keeping

Submit any manual declaration forms to team responsible for record keeping

Maintain register of declarations

Maintain register of declarations

Maintain register of declarations

Inform DD RA when annual review of declarations is complete

DD RA to review if Council Executive Chair or the UKRI central services Director have concerns or require advice.
Appendix 3: Frequently Asked Questions (FAQs)

UKRI Declaration of Interests
Guidance FAQs

March 2023

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Principles

1. Why isn’t the policy more specific?
The policy has purposefully been kept high-level and overarching, relying on individuals to determine which of the two guidance documents is applicable to them at the stage of declaring interests. The two guidance documents are each tailored to meet the considerations and requirements when managing the interests of a discrete group: guidance for employees
and non UKRI employees, including board and committee members, and guidance for assessors.

2. How will compliance with the policy be reviewed?
Each year, the Internal Controls team will complete a random check of declaration records to ensure compliance with the UKRI Policy. A report on the findings will be provided to the UKRI Deputy Director Risk and Assurance (DD RA) to provide assurances of policy compliance. DD RA will review, and where appropriate, provide advice and support.

Each Council and the UKRI Central Services Directorates should monitor their registers throughout the year, not just for the purpose of the above exercise.

Definitions

3. What is a conflict of interest?
UKRI defines a conflict of interest as a situation in which an individual’s ability to exercise judgement or act in one role is, could be, or is seen to be impaired or otherwise influenced by their involvement in another role or relationship. Even a perception of competing interests, impaired judgement or undue influence may be damaging to UKRI’s reputation.

Any private, personal or commercial interests which give rise to such a conflict of interest must be recognised, disclosed appropriately and either eliminated or properly managed. Reporting, recording and managing potential conflicts effectively protects employees and can help to generate public trust and confidence.

In addition, the interests or activities of a member of immediate family, close family member, or any other individual who may have a personal connection with the UKRI employee or non UKRI employee should be disclosed, so far as it is known to the individual. The obligation to disclose should not be dependent upon a third party’s consent, but it is reasonable to limit the obligation to disclose to the extent that the existence of the conflict is known to the individual.

4. What would you class as a conflict of interest?
Conflicts of interest exist on a spectrum of severity and can take many forms, for example:

- accepting hospitality or gifts from private sector companies during a procurement exercise
- awarding funding to individuals / organisations in which the decision-maker has a personal or financial interest
- awarding contracts to suppliers in which the decision-maker has a personal or financial interest
- awarding funding to individuals that may obtain a non-financial professional benefit from the consequences of a funding award, such as increasing their professional reputation or status or promoting their professional career
- having a senior role, whether paid or non-paid, in a non-profit organisation or charity which actively receives funding from UKRI
5. What’s the difference between a potential and perceived conflict?
Discussions on conflicts of interest often cover potential conflicts and perceived (or apparent) conflicts, as well as actual conflicts. These terms are often merged, the following definitions apply:

- **Potential conflict** – a set of circumstances where an individual has a secondary interest that could cause an actual conflict of interest to arise at some time in the future.
- **Perceived (or apparent)** – a set of circumstances where there appears to be a conflict of interest, but this is not in fact the case (or may not be the case).

Perceived conflicts can be as damaging as actual conflicts to the public trust on which government or organisations exercising regulatory functions typically depend.

6. Who is my immediate family?
For the purpose of the UKRI policy, immediate family is, for example, (but without limitation) defined as the spouse/partner, close family member (e.g. siblings or your children) or any other individual living at the same household as yourself or close family members. The general obligation on individuals to disclose the private interests of the above groups is limited by the extent to which the employee can reasonably be expected to know such interests and the consent of the relevant individuals to disclose any personal information.

7. What about my personal relationships?
UKRI recognises that individuals will develop relationships, friendships and external contacts in their personal and working lives that may influence their objectivity. The majority of these relationships will not give rise to any concern and can be regarded as a private matter.

However, individuals may have personal relationships (including family and friendships) with people who are engaged in activities that could have an interest in issues with which the employee deals or over which the employee has influence. Examples could include journalists, lobbyists or people who have business dealings with their area of work. Individuals are, of course, perfectly entitled to have such relationships. However, in the interests of transparency, employees should disclose the names and activities of any persons who could be seen to impact, perceived or otherwise, upon the individuals responsibilities.

8. What is meant by individuals in positions that exercise significant financial control or those involved in decision making?
Those staff who are more likely than others to have a decision-making influence on the use of taxpayers’ money, because of the requirements of their role. UKRI considers decision-making staff to be:

- executive, non-executive and partner members of the UKRI Board (or equivalent roles) who have decision making roles which involve the spending of taxpayers’ money.
- members of advisory groups which contribute to direct or delegated decision making on the commissioning or provision of UKRI services.
- administrative staff who have the power to enter into contracts on behalf of the UKRI.
Responsibilities

9. Who should make a Declaration of Interest?
If you fall into one of the below categories you are required to declare interests relevant to your role and responsibilities:

- non-executives, including members of the UKRI Board, associated Committees and Councils
- UKRI Executive Committee members
- individuals in positions that exercise significant financial control or those involved in decision making processes (examples include recruitment and those involved in procurement and contract management)
- all employees UKRI band G (or equivalent), and above
- employees who intend to apply for, or are in receipt of UKRI grant funding

The table below provides details of UKRI Band G equivalents.

<table>
<thead>
<tr>
<th>UKRI Band*</th>
<th>Equivalent bands / grades</th>
</tr>
</thead>
<tbody>
<tr>
<td>G</td>
<td>2b, 2s, 3, 10&amp;, 11, 2</td>
</tr>
</tbody>
</table>

*Including AHRC, BBSRC, EPSRC, ESRC & STFC

In deciding whether you need to make a declaration of interest you should consider whether your role and responsibilities include decision making. You should read the information on Roles with heightened risk and the definition of What is meant by decision making staff. If you remain unsure you should speak to your line manager in the first instance. Alternatively contact the UKRI Internal Controls team: conflictsofinterest@ukri.org

10. When should I make a Declaration of Interest
All interests should be declared as and when they arise, via the DOI Portal or the manual disclosure form. Under no circumstances should you wait to receive prompts from your line manager, DD RA, HR, or Secretariat before updating your record. Individuals are responsible for ensuring that their declarations are always kept up to date. As soon as a declaration has been made, line management or equivalent, must ensure that they review all declarations and agree any mitigating actions if required.

11. Who should assess my Declaration of Interest?
The process for handling Declarations of Interest differs depending on the individual’s role. Further details are provided in the table below.

Submission arrangements may be made locally, i.e. board members may submit to the
Secretariat who will then liaise with the Executive Chair for assessment.

<table>
<thead>
<tr>
<th>Role</th>
<th>When:</th>
<th>Responsible for initial assessment:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-executives, including members of the UKRI Board, associated Committees and Councils</td>
<td>Annually or by exception</td>
<td>Council Executive Chair or those with delegated authority / UKRI DD RA</td>
</tr>
<tr>
<td>UKRI Executive Committee members</td>
<td>Annually or by exception</td>
<td>Council SIM or those with delegated authority</td>
</tr>
<tr>
<td>All employees UKRI band G or equivalent and above</td>
<td>Annually or by exception</td>
<td>Line Manager</td>
</tr>
<tr>
<td>Employees who intend to apply for, or are in receipt of UKRI grant funding</td>
<td>By exception</td>
<td>By exception</td>
</tr>
<tr>
<td>Individuals in positions that exercise significant financial control or those involved in decision making processes (examples include recruitment and those involved in procurement and contract management)</td>
<td>Annually or by exception</td>
<td>Line Manager / Responsible Manager</td>
</tr>
<tr>
<td>Advisory group members (including advisory panels, boards and committees)</td>
<td>Annually or by exception</td>
<td>Chair of the relevant group or those with delegated authority</td>
</tr>
<tr>
<td>All other employees and non UKRI employees</td>
<td>By exception</td>
<td>Line Manager / Responsible Manager</td>
</tr>
</tbody>
</table>

Declarating and Managing Interests

12. How do I declare an interest?
You should start by completing a declaration. Depending on your role, this maybe via the DOI Portal, MO Communities (MOC) or the manual disclosure form. This should be submitted to your line manager or equivalent responsible individual. As soon as a declaration has been disclosed, your line manager or responsible manager will undertake the initial assessment and agree any mitigating actions if required. Any mitigating actions should be revisited regularly, at least annually by your line manager, escalating to DD RA where required.

The table below sets out how each group should disclose interests:

<table>
<thead>
<tr>
<th>Groups</th>
<th>How to disclose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-executives, including members of the UKRI Board, associated Committees and Councils</td>
<td>UKRI DOI Portal</td>
</tr>
<tr>
<td>UKRI employees</td>
<td>UKRI DOI Portal</td>
</tr>
<tr>
<td>ILUK Monitoring Service Providers</td>
<td>MO Communities (MOC)</td>
</tr>
</tbody>
</table>
13. I am a UKRI employee and I intend to apply for UKRI grant funding, what should I do?

Your intention to apply for funding should be declared as soon as it arises in line with the guidance for employees and non UKRI employees, including board and committee members, using the DOI Portal. This should be revisited regularly throughout the application process. You should also declare your role within UKRI as part of the funding application process and in line with the guidance for assessors.

Individuals are responsible for ensuring that their declarations are always kept up to date. As soon as a declaration has been disclosed, your line manager or equivalent must undertake the initial assessment and agree any mitigating actions if required. The assessment should take into account any potential conflict relevant to the application assessment / funding decision process, as well as any conflict which may arise in the event of a successful funding application. Any mitigating actions should be revisited regularly, throughout the application process by your line manager, escalating to DD RA where required. Each Council or UKRI Central Services Directorate will be responsible for recording, reviewing, managing and mitigating conflicts of interest within their respective teams.

14. I am a member of a Board / Committee but also act as an assessor of funding applications, which guidance should I follow?

As the processes are separate for each of these roles you should read both sets of guidance to ensure you are aware of your responsibilities when performing either role. In your capacity as a board / committee member you will be required to follow the guidance for employees and non UKRI employees. When acting as an assessor of funding applications, you should follow the guidance for assessors.

15. When should Conflicts of Interest be identified/explored?

Conflicts will tend to vary over time and be context specific. Disclosure and review of all relevant information should take place regularly and particularly at key points in the employment ‘life-cycle’, such as when individuals join UKRI or change roles. Disclosures should be typically made:

- on appointment to the organisation
- on a subsequent appointment to a new role
- on outward secondment to another organisation
- when circumstances change
- at the time of the annual review process

16. Who decides if I have a conflict of interest?

On receipt of your completed declaration, your line manager or equivalent, or Executive Chair will determine, with you, whether an actual, potential, or perceived conflict of interest exists. If they determine that an actual, potential, or perceived conflict of interest exists, they will make
recommendations as to what conditions or restrictions, if any, should be imposed by the organisation to manage, reduce or eliminate such conflicts. They, with input from DD RA, if needed, will draft a mitigation action plan for agreement.

17. If I have a conflict of interest, can I still take part in the activity?
You should not take part in the activity until a mitigation plan has been approved by your line manager or equivalent, or Executive Chair. If in doubt discuss with your line manager, equivalent or the Internal Controls team.

18. When is a mitigation action plan needed and who drafts it?
If a line manager or equivalent determines that an actual, potential, or perceived conflict of interest exists, you will work together to draft a mitigation action plan to ensure the reduction, management, or elimination of any conflict. Any issues arising should be discussed with your UKRI Internal Controls team in the first instance.

19. What might a mitigation action plan include?
A mitigation action plan might include a range of actions:

- deciding that no action is necessary
- restricting an individual's involvement in discussions and excluding them from decision making
- removing an individual from the whole decision-making process
- removing an individual's responsibility for an entire area of work
- removing an individual from their role altogether if the conflict is so significant that they are unable to operate effectively in the role
- exclusion from any financial or commercial involvement
- limited access to relevant papers or document management systems folders
- keeping log of correspondence or contact

20. I have assessed a declaration and want to escalate to the DD RA, how do I do this?
You should escalate to the DD RA by email to internalcontrols@ukri.org.

21. I have already completed a form – why am I being asked to do it again?
This is an annual exercise providing a snapshot of individual interests at a particular point in time. To be meaningful it is important that the information is kept up to date and is seen to be kept up to date.

22. Once I have completed the Declaration of Interests Form, does that mean I do not have to declare anything during the course of the year?
No. Whilst the annual exercise is important, it does not replace the need for all employees to declare other relevant interests as they arise.
23. What if my circumstances change during the course of the year, and I have something new to declare?
You can update your annual declaration during the year as the need arises. The DOI Portal supports review and update of declarations year-round. For those using the manual declaration form, you should notify your line manager or Executive Chair, as appropriate.

24. Who is responsible for keeping a register?
Each Council or UKRI Central Services Directorate will be responsible for recording, reviewing, managing and mitigating conflicts of interest within their respective teams.

25. I am responsible for keeping a register, how should I do this?
You should direct individuals with access to the DOI Portal to make their declaration via the portal. Those without access should be directed to make their declaration using the manual declaration form. All manual disclosure forms for your area should be recorded on the DOI Portal to ensure a single, central record is maintained.

26. Do we still need to submit our Council register by email to the DD RA annually?
No, the nominated individual in each Council or UKRI Directorate should ensure all submissions and assessments are recorded on the DOI Portal. When the annual review of declarations has been completed you should notify the DD RA by email to internalcontrols@ukri.org.

27. Why do we need a nominated individual in each Council, if the register is held centrally and checked by the Internal Controls team? What about Centres, Institutes etc?
Although the register is held centrally on the DOI Portal, and the Internal Control team maintains an overview and checks compliance with the policy, each Council will still need to keep an eye on their declarations. Having a nominated individual enables hands-on management of the DOI policy and empowers a Council to have ownership of their DOI activity. Research Centres and Institutes should also have an individual to liaise with employees and a nominated individual within their parent Council.

28. Who is the nominated individual in my Council, Centre, Institute?
The list of nominated people is on the Declaration of Interests landing page on The Source.

29. I am the nominated individual in my Council. How often should I be checking our central register, sending reminders to my colleagues, liaising with our Centres, Institutes etc?
This depends on how many records your Council or Centre/Institute submits, we suggest at least every three months.

30. IUK Monitoring Officers are contractors and have their own contracts and T&Cs. Do they follow the UKRI DOI policy?
IUK Monitoring Officers are sub-contractors working on behalf of UKRI, so are covered by the UKRI DOI policy and their contracts. Their Terms & Conditions need to direct them to this.
Current contracts refer to policies, guidelines and codes of practice in the IUK DPS document library so this should be kept up to date.

31. I have read this guidance but still have questions about how to make a declaration? Who can I contact?
If you have any further queries on how to make a declaration, please speak to your line manager in the first instance. Alternatively contact the UKRI Internal Controls team: conflictsofinterest@ukri.org

Policy Communication

32. How will you make individuals and managers aware of their responsibilities in relation to the updated policy?
The updated policy and associated guidance (including this set of live FAQs) have been published internally on the Internal Controls site and externally on the UKRI website. This will be publicised internally on The Source, and externally via Council newsletters. This will be followed up regularly by the nominated individual within each Council and the corporate hub.

All new UKRI employees and non UKRI employees will be made aware of the policy and associated guidance during their induction, which will also be available to all current employees.

33. I can’t access the policies listed in the text of the DOI policy
You may need to have your VPN turned on to access the policies. Some are on the KnowledgeBase so you may need to be logged on to that too. If you still can’t access the policies, contact the IT helpdesk or the Internal Controls team.

Further Guidance

The policy and these FAQs cannot cover all declaration of interest scenarios. If in doubt send your question along with as much information as possible to: conflictsofinterest@ukri.org.