



# Declaration of Interests policy

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## Policy statement

This policy covers declaration of interests and the important role that all UKRI employees play in ensuring transparency and compliance with [The Seven Principles of Public Life](#). The policy is underpinned by the [UKRI Code of Conduct](#) and supplemented by two guidance documents, 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
- guidance for assessors of UKRI funding applications, including reviewers and panellists

Both guidance documents are on the [UKRI declarations of interest policy and guidance page](#).

This policy is intentionally high level and should be read in conjunction with the relevant guidance document (referenced above) to ensure readers are fully aware of the considerations and requirements relevant to their role.

This policy applies to UKRI employees and non UKRI employees, including all persons engaged to represent or act on behalf of UKRI, or its affiliated organisations worldwide. For the purpose of this policy, the use of the word ‘employee’ covers UKRI employees on permanent or fixed term contracts, as well as persons who are on secondment to UKRI. The term ‘non UKRI employee’ covers individuals such as:

- non-executive directors, board, council and committee members
- students
- visiting workers
- contractors (including Monitoring Service Providers)
- persons engaged and involved in UKRI decision-making and funding processes such as a ‘Reviewer’ and ‘Panellist’.

UKRI employees and non UKRI employees are expected to comply with the highest standards of professional and ethical practice and are required to declare any interests which may



conflict, or may be perceived to conflict, with UKRI’s business. Declaring interests supports transparency and demonstrates the integrity of UKRI’s business and employees by providing assurance that any potential conflicts are considered and managed effectively.

### 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](mailto:conflictsofinterest@ukri.org) with any feedback, queries or concerns.

### Management statement

This policy will be reviewed annually or to incorporate legislative change, where appropriate. It is approved by the [People, Finance and Operations Committee \(PFO\)](#). Trade Unions may request that the policy is reviewed.

Adherence to this policy and the supplementary guidance will:

- ensure that UKRI activities are compliant with public sector and ethical requirements and related policies (for example, [Whistleblowing](#)).
- allow UKRI to make impartial funding decisions in line with our [principles of assessment and decision-making](#).

This policy supplements other policies relating to regularity and propriety (for example, [Counter Fraud and Bribery Policy](#), UKRI Procurement Policy and [Trusted research and innovation principles](#)).

This policy is owned by the Deputy Director Risk and Assurance (DD RA). An equality impact assessment has been completed to ensure that this policy and associated guidance documents do not discriminate against anyone and that they promote where possible equality of opportunity.

Version Number	Status	Revision Date	Summary of Changes
Version 1.0	Published	March 2023	This policy supersedes the <a href="#">UKRI Conflicts of interest policy</a> and is owned by UKRI Deputy Director Risk and Assurance (DD RA)
Version 1.1	Final	July 2023	Updated links to guidance for UKRI assessors, including reviewers and panellists
Next revision date		January 2024	

## 1. Purpose

- 1.1 The purpose of this policy is to set out the responsibilities of UKRI employees and non UKRI employees to declare interests and manage any potential conflicts of interest, using the relative guidance and tools provided. It should be read in conjunction with the relevant guidance document. Both guidance documents are on the [UKRI declaration of interest policy and guidance page](#).



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- 1.2 Conflicts of Interest can occur in the course of individuals work and it is important that they know what to do if or when this happens. Having a conflict of interest does not necessarily mean that an individual cannot be involved in decision-making. But it is important that conflicts – actual or perceived – are managed properly so decisions taken are not influenced by private interests.
- 1.3 UKRI is committed to establishing and applying appropriate standards of regularity and propriety in accordance with [Managing public money](#). We require individuals to act honestly and with integrity and to safeguard the public resources for which they are responsible. All UKRI employees are required to conduct themselves in accordance with the [UKRI Code of Conduct policy](#).
- 1.4 Our approach is underpinned by [The Seven Principles of Public Life](#) identified by the Committee on Standards in Public Life.

## 2. Definitions

- 2.1 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. Examples can be found in the separate guidance documents. Both guidance documents are on the [UKRI declarations of interest policy and guidance page](#).
- 2.2 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 UKRI, UKRI employees and non UKRI employees and can help to generate public trust and confidence.
- 2.3 In addition, the interests or activities of an immediate or 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.
- 2.4 These conflicts can lead to actual or potential unfair bias, and in more extreme circumstances can lead to actual or perceived fraud, bribery, or corruption, as outlined in the UKRI [Counter Fraud and Bribery policy](#).

## 3. Responsibilities

- 3.1 Individuals must ensure that:
  - they read this policy and the relevant guidance applicable to their role (guidance documents are on the [UKRI declarations of interest policy and guidance page](#).)



- they make a declaration when they have become aware of an interest which may represent or be perceived to represent a conflict relevant to their role, at the earliest opportunity
  - private interests, whether these are of a personal, financial or commercial nature, do not impact adversely upon the ability to undertake their official duties responsibly
  - they do not put themselves in a position where actions can reasonably be perceived to be open to improper influence
- 3.2 Individuals should maintain integrity and professionalism when undertaking their roles, acting in UKRI's best interest at all times.
- 3.3 As soon as a declaration has been made or recognised, the responsible manager (as defined in the guidance documents) must ensure that they review the declaration to determine if a conflict of interest has arisen, and if so, agree any mitigating actions.

## 4. Declaring and managing interests

- 4.1 Proportionality is a key principle in UKRI's approach to the declaration and management of interests. It recognises that the development of relationships with outside bodies is often beneficial to both the organisation and the individual. Disclosures should only be required where interests are, or could be perceived as, relevant to the role and responsibilities of the individual.
- 4.2 The procedures for declaring interests and managing conflicts will differ depending on which group the individual identifies themselves in:
- employees and non UKRI employees, including board and committee members
  - assessor - reviewer
  - assessor - panellist
- 4.3 UKRI will manage the Declaration of Interest process in three stages:
1. disclosure
  2. decision
  3. review
- 4.4 Where an individual finds themselves in the position where they have, or could be perceived to have, a conflict of interest they should declare immediately.
- 4.5 When an interest is declared or recognised, the declaration should be reviewed in line with the relevant guidance document to determine if there is a conflict or not, the resulting decision should be recorded to mitigate any potential risk exposures.

## 5. Failure to make a declaration

- 5.1 Failure of an employee to declare interests in line with this policy, may lead to disciplinary action being taken in line with the [Managing Performance and Conduct policy](#).



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- 5.2 Failure by non-employees to declare interests in line with this policy and the terms and conditions of appointment, may lead to termination of appointment and personal civil liability for any resulting third-party losses.
- 5.3 Failure by individuals to make full, accurate and timely declarations, or to abide by any conflicts management plan, may be subject to investigations that may lead to civil proceedings or a criminal prosecution.

### 6. Reporting concerns

- 6.1 Any concerns such as:
  - an interest or potential conflict that has not been declared or accurately declared; or
  - any conflicts where undue influence over management decisions is suspected should be reported to the relevant parties in accordance with the UKRI [Counter Fraud and Bribery policy](#) and [Whistleblowing policy](#) (UKRI line manager, Council liaison, [reportfraud@ukri.org](mailto:reportfraud@ukri.org) or [whistleblowing@ukri.org](mailto:whistleblowing@ukri.org)) for investigation.