**Appendix 5**

# Oxford Brookes University

## Quick Start Guide

**Overview**

The policy covers guidance on managing and declaring conflicts of interest. The policy sets out procedures for actively managing potential / actual conflicts of interest which arise on the ground. All colleagues are required to identify and seek advice on managing any conflicts of interest on a case-by-case basis, regardless or not of whether an annual declaration form has been completed.

**What do I need to do?**

### **A: Declarations of Interest**

1. If you fall into one or more of the following groups, you are required to make a return to the VCO Secretariat:

* Governors
* PVCS Education and Research and Global Partnerships
* All PVC Deans
* Deputy Director of Estates (Commercial Services) and Deputy Director of Estates (Large Projects)
* Directors of Professional Services
* Key outward facing roles including the Director of Research, Innovation and Enterprise, Head of Procurement, Directors and Heads of Marketing, Recruitment and Communications
* Staff who in their normal role are involved in negotiating or have a material influence on, or have access to highly sensitive and commercial information (including contracts for goods or services) or partnerships on behalf of the University.
* Members of the Financial Support Committee
* Head of Secretariat

The form only needs to be completed once on an annual basis. There is an option within the form to make a “nil return” as necessary.

Staff must ensure that their record is kept up to date and report any substantive additions or alterations promptly to the VCO Secretariat.

**For all other staff, you only need to make a declaration if you have interests which are relevant to your work for the University.**

**The form can be accessed on the Governance Hub here (link to be inserted)**

Returns should be made by the end of October each year.

1. In addition to completing a declaration, if you have any interests which raise concerns, you need to inform the person responsible for oversight of the relevant area, so that potential conflicts can be avoided from the outset. You will be asked to confirm that you’ve done this as part of your return.
2. Please ensure that your record is kept up to date over the course of the year by reporting any additions or alterations promptly to the VCO Secretariat.

### **B: Conflicts of Interest**

**Identify**

It is the duty of every member of staff to accurately and promptly disclose:

* A change in status of an existing actual, perceived, or potential conflict of interest and/or commitment.
* a new actual, perceived, or potential conflict of interest and/or commitment.

**Declare**

The above should be declared to the person’s Line Manager in the first instance unless the disclosure relates to the person to whom otherwise the disclosure would be made. The following are escalation points after the line manager stage or where escalation to a line manager may not be appropriate.

| **AREA** | **ESCALATION (COI Reviewers)** |
| --- | --- |
| Committee or Group | Declarations or concerns should be raised to the Chairperson who will then escalate in line with this policy as required |
| Directorate | Declarations or concerns should be raised to the Director who will then escalate in line with this policy as required |
| Faculty | Declarations or concerns should be raised to the Dean of the Faculty who will then escalate in line with this policy as required. |
| Research & Innovation | Declarations or concerns should be raised to the Director of Research, Innovation and Enterprise |

**Manage**

The COI reviewer will, if necessary, consult with the appropriate people and decide on what is the best way to manage this. This can include:

•taking no further action;

•continuing with the activity but with modifications;

•desisting from the activity.

**Record**

The COI reviewer (or delegated person) will document how the potential conflict will be managed. The information (record) regarding the conflict of interest will be held by your school/department/directorate. Only authorised people will have access to the data.

The VCO Secretariat will be provided with all declarations on an annual basis in order to provide a summary report to the Audit and Risk Committee on the conflicts of interest declared during the academic year to provide assurance the process implemented is being carried out in accordance with the policy.