

Conflicts of Interest

Policy

Version:	7.00
Status:	Final
Date:	21/08/2025

Conflicts of Interest Policy

Table of Contents

1. Introduction.....	1
2. Definitions.....	1
3. Examples of situations where conflicts of interest may arise	1
4. Scope	2
5. Responsibility for managing and reporting conflicts of interest	2
5.1 Disclosure and managing conflicts of interest	3
5.2 Conflicts of interest as part of committees and boards.....	4
5.2.1 Disclosure of interests.....	4
5.2.2 Management of conflicts of interests in meetings.....	4
5.3 Research related conflicts of interest.....	5
5.3.1 Researcher conflict	5
5.3.2 Research funding	5
6. Data protection.....	6
7. Monitoring and review	6
Appendix A: Committees and Boards.....	7

Conflicts of Interest

Continuation page

1. Introduction

University of the Built Environment encourages members of staff and Postgraduate Research (PGR) and London School of Architecture (LSA) students to engage in a wide variety of internal and external activities as it recognises the advantages to both the institution and to the individuals concerned. However, on occasions this may give rise to conflicts of interest or perceived conflicts. This policy sets out how the University will identify and manage conflicts of interest so as to ensure that its activities are and are seen to be conducted to the highest standards of ethics and integrity.

All employees, University committee members and PGR and LSA students are required to recognise situations in which there could be a conflict of interest or might reasonably be seen by others to be a conflict of interest and to disclose it. If an individual is uncertain about how this policy affects them, they should contact their line manager to discuss.

2. Definitions

A conflict of interest is a situation in which an individual or organisation has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if the conflict of interest is not declared and properly managed.

Conflicts of interest may be financial or non-financial. A financial conflict of interest is where there is or appears to be an opportunity for personal financial gain. For example, anything of monetary value such as payments for goods or services or resources or assets. A non-financial conflict could include the enhancement on an individual's career, education or professional reputation or access to privileged information.

3. Examples of situations where conflicts of interest may arise

Conflicts of interest may arise in the following circumstances; however, this does not represent an exhaustive list:

- Where someone works for or carries out work for the University, who has friends, relatives or employees taking a University programme.
- Where a University employee is also completing a University programme.
- When an individual has interests that conflict with their professional role.
- Where an individual is engaging an external supplier for services, and they may be related to that supplier.

Conflicts of Interest

Continuation page

- When an individual is in a position of authority in one organisation that conflicts with their role or interests in another organisation.
- Where an individual works for or carries out work for the University but may have personal interests in another business which offers similar services.
- Where the University delivers both the programme delivery or training and the end-point assessment.

There can be situations in which the appearance of a conflict of interest is present even when no conflict actually exists. Thus, it is important for all employees when evaluating a potential conflict of interest to consider how it might be perceived by others.

4. Scope

The purpose of this policy is to ensure the identification and resolution of conflicts of interest arising from University employees or third parties that are involved in the design, development, delivery, assessment, award and quality assurance of qualifications for the University.

This policy applies to all employees of the University, PGR and LSA students, external committee members, consultants and associates. This policy does not cover conflicts of interest relating to the governance of the University's Board of Trustees, please instead refer to the University's Board of Trustees Conflicts of Interest Policy.

5. Responsibility for managing and reporting conflicts of interest

It is the duty of every employee to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest. Similarly, if a manager becomes aware of a possible conflict of interest which an employee has not considered they should bring it to the employees' attention.

Individuals that are external to the University but are involved in any aspects of the delivery of our programmes, such as External Examiners or external committee members, must notify the University of any other activities that they undertake that could result in an actual or perceived conflict of interest.

All employees of the University and PGR and LSA students are encouraged to report and disclose any potential conflicts of interest, without fear of reprisal. Failure to disclose a conflict of interest or not ceasing involvement until the conflict has been resolved is a serious matter and in certain instances may lead to disciplinary action.

Conflicts of Interest

Continuation page

Employees of the University, PGR and LSA students and committee members will receive an annual reminder of this policy and of their responsibility to report conflicts of interest.

5.1 Disclosure and managing conflicts of interest

In most circumstances the expectation is that disclosure should be made at the time the conflict first arises with the exception of committee or board business and research related conflicts which are covered separately below. The declaration should be made to the relevant member of the Senior Leadership Team (SLT) for the department concerned. Confidentiality of disclosure will be respected as far as possible and will only be shared with those that need to be aware. Until the conflict has been investigated and resolved the employee must take part in no activities relating to that interest at the University.

Where it is identified that there is no conflict of interest the employee can proceed on receipt of confirmation from SLT.

Where there is judged to be a conflict of interest, in many cases it can be managed by the documentation of the declaration on the Register of Conflicts of Interest.

In some instances, it will need to be agreed how the conflict can be actively managed. Where this is required, the approach and the mitigation should be formally recorded.

Conflicts of interest may be dealt with in the following ways:

- Not taking part in discussions about certain matters.
- Not taking part in certain decisions or referring to others certain decisions.
- Not marking or supervising certain students.
- Restricting access to certain systems or information.
- Standing aside from involvement in a particular project.
- Not participating in the appointment, supervision or evaluation of a person with whom the staff member has a close personal relationship.
- Declaring an interest to a third party.

When a member of staff believes that there is no longer a conflict of interest they should notify SLT in writing to request that the disclosure record is closed.

Conflicts of Interest

Continuation page

5.2 Conflicts of interest as part of committees and boards

5.2.1 Disclosure of interests

All board and committee members should be regularly reminded to declare conflicts of interest (please see Appendix A for a list of committees and boards that this policy applies to). This is particularly important for Module/Unit Boards, Progression and Awards Board and assessment Scrutiny Boards and as such declaration of conflicts of interests must be a standing item on the agenda within the first part of the meeting, allowing employees and External Examiners to declare conflicts of interest including personal relationships with students, involvement in complaints or disciplinary investigations.

For all deliberative committee meetings there must be a standing agenda item as part of the first meeting in the academic year to remind committee members about declaring conflicts of interest. This item should cover what a conflict of interest is and how the members of the committee should declare such an interest if and when such circumstances arises. Where there is a declaration a record should be included within the minutes and where appropriate it should be logged on the Register of Conflicts of Interest. In addition to this, at meetings where student results will be considered or in the case of Academic Board ratification, there should be a further reminder about declaring conflicts of interest and any members with a conflict should be requested to leave the room for all or part that item.

5.2.2 Management of conflicts of interests in meetings

On notification of any conflicts of interest the chair can actively manage the conflict of interest. A minute will be taken to record the conflict of interest setting out:

- The nature and extent of the conflict;
- an outline of the discussion; and
- the actions taken to manage the conflict.

Where appropriate the meeting secretary will also notify the Deputy Vice Chancellor (University Secretary), and the conflict will be logged on the Register of Conflicts of Interest.

Conflicts of Interest

Continuation page

5.3 Research related conflicts of interest

5.3.1 Researcher conflict

Within research, a conflict of interest refers to a situation in which an individual involved in undertaking research has an alternative interest that may compromise, or appear to compromise, their judgment and/or the integrity of the research.

For example, a researcher developing a new system or material has a conflict of interest if they will receive a financial reward if their study results in positive findings. The conflict arises because the financial gain to be had by the researcher could lead to a real/perceived increased bias in their conducting/reporting of the research.

This would apply mainly if the Researcher already holds shares or an interest in something related which goes beyond the usual benefit to the Researcher relating to reputation, promotion or even a potential patent or revenue stream from commercialisation. In this case any potential conflict must be notified to the Research Office.

A decision will then be made as to whether the research can continue with enhanced scrutiny or disclosures on the outputs or if the research should not be pursued. The Research Office may refer this to the Research Ethics Panel for a decision.

5.3.2 Research funding

Researchers may be offered funding from an individual/organisation to conduct research. Before accepting, researchers should carefully consider whether accepting the funding could lead to a conflict of interest. They should consider:

- What are the motives of the funder?
- Are the motives in agreement with the University's aim to further excellence in scholarship, teaching and research?
- Could the funder place any restrictions on the publication of the research?
- Could the results be exploited by the funder in any way that could pose harm or increased risk of harm?
- Would acceptance of the funding lead to a bias/perceived bias in the research design or results?
- Does the funder have a declared ethical policy and record?
- Does the funder raise ethical or moral questions or have a potential to cause reputational damage to the University?

Conflicts of Interest

Continuation page

If the answer to any of these questions is yes, then this must be notified to the Research Office before any agreement is made. The Associate Dean (Research) may advise against accepting the Research funding or may refer it to the Ethics Committee. In all cases this conflict should be transparent when any findings are published.

6. Data protection

The information provided in disclosure will be processed in accordance with the data protection principles **under the General Data Protection Regulation (2016/679), the Data Protection Act 2018 and any amendment or update to that legislation.**

7. Monitoring and review

The Register of Conflicts of interest should be reviewed annually by the Deputy Vice Chancellor (University Secretary) to audit whether conflicts of interest have been effectively managed.

This policy will be subject to review in line with the University's schedule of policy review and is subject to approval by the SLT.

Appendix A: Committees and Boards

Academic Board

Academic Misconduct Panel

Apprenticeship Assurance Review Group

Apprenticeship Quality Monitoring Committee

External Examiner Appointments Subcommittee

Honorary Degree Panel

Learning, Teaching and Enhancement Committee

Teaching Excellence Framework Subcommittee

Mitigating Circumstances Panel

Module Boards

Progression and Awards Boards

Quality Standards and Enhancement Committee

Recognition of Prior Learning Panel

Recognition of Prior Experiential Panel

Research Committee

Research Degree Subcommittee

Research Ethics Panel

Research Excellence Framework Subcommittee

Research Misconduct Panel

Scrutiny Boards