

LONDON SCHOOL
OF SCIENCE & TECHNOLOGY

Conflict of Interest Policy

Version 5.0

Approved by the Board of Governors

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Contents

DOCUMENT INFORMATION 1
1. INTRODUCTION 2
2. THE PURPOSE OF THIS POLICY 2
3. IDENTIFYING CONFLICTS OF INTEREST 3
4. PROCEDURE FOR DECLARING INTERESTS 3
5. PROCEDURES FOR MANAGING CONFLICTS 4
6. ENFORCING AND REVIEWING THIS POLICY 4
APPENDIX A: Declaration of Interest Form 5
VERSION HISTORY 7

1. INTRODUCTION

1.1. This policy applies to all employees, all members of the Board of Governors and its committees at LSST, and to external members of committees. It sets out guidelines and procedures for identifying, monitoring and managing actual and potential conflicts of interest. Any potential conflicts of interest which may arise in relation to members of staff and external consultants at LSST will be addressed by the relevant contracts of employment or engagement.

1.2. In this policy references to:

- "Conflicts" or "conflicts of interest" include actual and/or potential conflicts of interest and/or duty.
- Persons who are "connected" with a governor, member of staff or external consultant of LSST means.
- A child, stepchild, grandchild, parent, brother or sister of a governor, member of staff or external consultant of LSST.
- The spouse, unmarried partner or civil partner of a governor, member of staff or external consultant of LSST.
- Any person who is in a business partnership with a governor, member of staff or external consultant of LSST or any person who is in a business partnership with any person falling within paragraph (i) or (ii) above.
- Any company, business, trust, or organisation in which a governor, member of staff or external consultant of LSST (or any other person connected to them) has an interest as a beneficiary or through ownership, control or influence.
- If in doubt about whether a person is connected, a governor, member of staff or external consultant of LSST should seek advice from LSST's Legal Counsel.
- "Benefit" includes any payment or material benefit (including property, loans, goods and services), other than reasonable out of pocket expenses.

2. THE PURPOSE OF THIS POLICY

2.1. The governors, members of staff and external consultants of LSST have a duty to act in the best interests of LSST. This means that the governors, members of staff and external consultants of LSST must not place themselves in a position where they have, or may have, a direct or indirect interest that conflicts with their duties as governors, members of staff and external consultants of LSST.

2.2. Conflicts of interest can inhibit open discussions and may result in governors, members of staff and external consultants of LSST taking irrelevant considerations into account or

making decisions that are not in LSST's best interests. All governors, members of staff and external consultants of LSST must therefore be alert to the possibility that they, or their colleagues, could be affected by a conflict of interest.

2.3. The procedures in this policy will enable governors, members of staff and external consultants of LSST to identify and manage conflicts of interest so that they can ensure that conflicts do not prevent them from making decisions in the best interest of LSST. The policy will also help protect both LSST and governors, members of staff and external consultants of LSST from any appearance of impropriety in cases where conflicts of interest arise.

3. IDENTIFYING CONFLICTS OF INTEREST

3.1. A conflict of interest is any situation in which a governor's, member of staff or external consultant's direct or indirect interests could, or could be seen to, prevent them from making a decision only in the best interests of LSST.

3.2. When considering if they have a conflict of interest, governors, members of staff and external consultants of LSST must be aware of the following principles.

3.3. A conflict of interest exists if there is a possibility that their personal interests could influence their decision-making, even if their decision-making is not in fact adversely affected by the conflict; and the interest that gives rise to a conflict may be direct or indirect.

4. PROCEDURE FOR DECLARING INTERESTS

4.1. All governors, members of staff and external consultants of LSST have a personal responsibility to declare any interest that might reasonably be regarded as potentially giving rise to a conflict.

4.2. A member of staff shall make their disclosure to their Line Manager and HR.

4.3. On appointment, all governors must complete a declaration of interest form (Annex 1):

- Listing any personal interests, business interests or other direct or indirect interests that might potentially give rise to a conflict of interests.

- Listing any interests of persons connected to them that may potentially give rise to a conflict of interest.

- Confirming that they are not aware of any conflict, other than those already disclosed, that exists between their role and their personal circumstances or other interests.

- Confirming that they will update the form annually, or sooner if any changes occur.

- Confirming that they will declare any conflict that arises in the future.

4.4. The information provided by governors, members of staff and external consultants must be recorded in a register of interests. At least once in every 12-month period, all governors must review the information relating to them contained in the register of interests and declare that the information is correct or make a further declaration if necessary.

4.5. It is for each individual to decide which matters to declare but, if in doubt, they should make a declaration. If they would like to discuss the issue, they may contact LSST's Legal Counsel for confidential guidance.

4.6. The information provided will be processed in accordance with the principles for processing personal data set out in UK data protection legislation as set in the Data Protection Policy. Data will be processed only for the purposes set out in this policy and not for any other purpose.

4.7. A Register of Interests will be maintained and updated accordingly. At least annually, the Board of Governors will formally review the Register and ensure appropriate oversight.

5. PROCEDURES FOR MANAGING CONFLICTS

5.1. If a conflict arises and depending on the seriousness of the conflict, the conflicted individual must withdraw from relevant discussions or decision-making processes, not pursue the course of action that gives rise to the conflict or resign.

6. ENFORCING AND REVIEWING THIS POLICY

6.1. Any failure to comply with the terms of this policy could result in disciplinary action taken against the conflicted person.

6.2. This policy must be reviewed annually, or sooner if required.

APPENDIX A: Declaration of Interest Form

Name: **Position:**					
Employment: Please disclose any current employment, consultancy, voluntary, or other work-related engagement with external organisations that could potentially create a conflict of interest with your duties or the interests of the institution	**Name of Organisation**	**Position Held (Please state if voluntary)**	**Date Appointed**	**Nature of Business Potential Conflict**	**State whether Direct or Indirect**
External Directorships: Please disclose any interests or directorships you hold in other external organisations that could potentially create a conflict of interest with your duties or the interests of the institution	**Name of Organisation**	**Position Held**	**Date Appointed**	**Nature of Business Potential Conflict**	**State whether Direct or Indirect**
Shareholding: Please disclose any direct or indirect	**Name of Company/Organisation(s)**	**Nature of Interest (e.g., equity stake)**	**Date of Share Acquisition**	**Nature of Business**	**State whether Direct or Indirect**

shareholding, including minority interests, in any company or organisation where such financial interest could potentially create a conflict of interest with your duties or the interests of the institution					
Trusteeships: Please disclose any trusteeships or equivalent governance roles held in external organisations, including charities and voluntary bodies	**Name of Organisation & Charity Registration No. (if applicable)**	**Position Held**	**Date Appointed**	**Nature of Organisation Potential Conflict**	**State whether Direct or Indirect**
Public Appointments: Please disclose any public appointments including positions on Boards/Committees or Advisory groups whether paid or unpaid	**Name of Organisation**	**Position Held (Board/Committee/Advisory Group) Member**	**Date Appointed**	**Nature of Business Potential Conflict**	**State whether Direct or Indirect**
Political Interests: Please disclose any political activity, affiliation, or interest that could reasonably be perceived to conflict with your duties or the impartiality of your role in the organisation	**Name of Political Party**	**Activity (to include holding office/standing for election/campaigning/political event participation etc.)**	**Date Appointed**	**Party Ideology Potential Conflict**	**State whether Direct or Indirect**

Professional Bodies: Please disclose any membership, positions, or affiliations with professional bodies, associations, or regulatory organisations that could potentially create a conflict of interest with your duties or the interests of the institution	**Name of Organisation**	**Position Held (Membership/Governance/Advisory Role)**	**Date Appointed**	**Nature of Organisation Potential Conflict**	**State whether Direct or Indirect**
Other: Please disclose any other interests not detailed above					

I declare that the information provided in this Conflict of Interest Form is true, complete, and accurate to the best of my knowledge and belief. I understand that providing false or misleading information, or withholding relevant information may result in disciplinary or other formal action being taken against me in accordance with applicable policies or regulations.

Signature: _____ **Name:** _____

Date: _____

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