

## Conflict of Interest Policy and Practice

### 1. Purpose

This policy aims to uphold the integrity, transparency, and accountability of the University's decision-making processes by identifying, declaring, and managing actual, potential, or perceived conflicts of interest. The policy is also aligned with the UK Committee on Research Integrity's [Concordat to Support Research Integrity](#). This policy supports the University's commitment to fostering an environment that is Inclusive, Caring Innovative, and Collaborative.

### 2. Scope

This policy applies to all University Members which includes:

- all staff (academic and professional services);
- members of the University Court and its committees;
- students engaged in governance or research and
- individuals acting on behalf of the University (e.g., consultants, contractors, emeriti).

This includes individuals who hold grants but are not current members of staff of the University, retired members who are still conducting research, and teaching or research visitors. It also applies to the staff and directors of subsidiary companies and joint ventures of the University.

### 3. Objectives

A conflict of interest can occur when an individual duties to the University compete with their personal interests or their duties to other people or organisations. Actual or perceived (where it may appear to a reasonable person that an individual's interests could influence their decisions) conflicts can arise from external activities that are undertaken in addition to a University role, personal relationships, or conflicting roles within the University. These can be financial, non-financial or both.

Where University members hold multiple roles and where external relationships are many and varied, conflicts of interest are bound to arise. In order to manage the associated risks to an acceptable level, University Members are required to recognise and disclose activities and relationships that might give rise to actual or perceived conflicts of interest. If all University members manage their activities appropriately, they can usually proceed with these as normal whilst at the same time upholding obligations to the University, meeting regulatory and other external requirements and protecting the integrity and reputation of the University and its members.

By contrast, if they do not, such conflicts – or the perception of conflicts – may jeopardise the University’s public standing and may cause serious damage to the reputation of the University and of the individuals concerned. This may also result in litigation or financial loss, and individuals may be subject to disciplinary procedures.

With regards to Conflicts of Interest, the University’s objectives are to ensure that:

- (i). interests of senior staff as well as members of Court and other key decision makers are declared and transparently reported and are in line with the [Scottish Code of Good HE Governance 2023](#);
- (ii). any actual or perceived financial or non-financial conflicts of interest (arising from external activities, personal relationships or roles within the University) are identified and properly managed so that the activity can be carried out without risk to the integrity or the reputation of the University or individuals themselves;
- (iii). governance of the University is conducted with close regard to the risks of financial and non-financial conflicts of interest;
- (iv). procedures are in place for conflicts of interest to be identified and managed in compliance with the relevant professional, legal, ethical and regulatory standards on conflicts of interest;
- (v). activity is avoided in cases where a conflict of interest cannot be managed; and
- (vi). all staff and students are aware of the importance of compliance with the Policy and that compliance with the Policy is monitored.

The University wholly endorses the nine principles of public life in Scotland advocated by the Scottish Government’s Model Code of Conduct for Members of Devolved Public Bodies and as recommended by the Scottish Code of Good HE Governance. These principles form the basis for policy and are provided in full in [Appendix 1](#).

## 4. Responsibilities

**All University members** (see [Section 2](#)) are responsible for ensuring that they comply at all times with this policy. Each individual is responsible for recognising situations in which they have a conflict of interest or might reasonably be seen by others to have a conflict, to declare that conflict to the appropriate person (see [Section 6](#)) and to take such further steps as may be appropriate as set out in more detail below.

The duty to declare a possible or perceived conflict applies to the perception of the situation rather than the actual existence of a conflict. If the situation cannot reasonably be regarded as likely to give rise to a conflict of interest, then there is no duty to declare it. If there is any uncertainty as to whether there is a conflict, or if an individual is uncertain

about the application of this policy or how it might affect their activities, they should contact the “**Appropriate Person**” (see [Section 6.1](#)).

**The Senior Management Team (SMT)** is responsible for ensuring that this policy is implemented and maintained and that appropriate explanatory guidance is provided. Each member of SMT is responsible for ensuring appropriate implementation in their respective area and reviewing Management Plans where they are required

**The Vice-Principal and University Secretary** is responsible for developing and maintaining the policy and associated procedure(s), reviewing reports on compliance, providing support and guidance, escalating risks and issues.

**The Head of Governance and Deputy Secretary** is responsible for keeping records of disclosures and management plans via a central repository. Declarations relating to Committee business are captured in relevant committee minutes and those relating to personal relationships are reported directly to People Services.

The “**Appropriate Person**” is responsible for ensuring, where appropriate, that the Conflict of Interest Declaration Form is submitted to the relevant service.

**The Boards of Directors of majority and wholly owned subsidiary companies of the University** are responsible for ensuring that this policy is implemented and maintained within those companies, and that staff and other relevant persons are made aware of the policy and associated explanatory guidance.

**The Boards of Directors of equal and minority joint ventures** are expected to act in accordance with this or equivalent policies.

Additionally, **senior staff (e.g. Senior University staff, Court and Committee members) and other key decision makers** are required to declare interests annually (see [Section 7.1](#)) as well as when potential conflicts arise, and to update their register of interest as required.

In addition to complying with this policy, **researchers** need to be aware of and comply with conflict of interest requirements set by external funders or other bodies with whom agreements have been made. Further information is provided in [Appendix 2](#).

## 5. Recognising Potential Conflicts of Interest

There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. Thus, it is important for all university members when evaluating a potential conflict of interest to consider how it might be perceived by others. Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest. In order to recognise actual or perceived conflicts of interest, key interests need to be identified as set out below.

## 5.1 Roles and Relationships

- roles or activities involving parties outside the University;
- roles held by individuals outside the University;
- multiple roles held by individuals inside the University group including in subsidiaries and joint ventures;
- committee membership and roles involving decision-making in or on behalf of the University, departments, faculties or other units;
- close personal relationships<sup>1</sup>.

Employees should not enter into a personal relationship with a current student of the University which could compromise (real, perceived or potentially) the objectivity of the professional relationship. Therefore, any employee in a personal relationship with a current student of the University must declare the relationship to their Line Manager to ensure there is no such compromising of the objectivity of the professional relationship, including Post Graduate Research Students who may teach.

An employee who has a personal relationship with a colleague working in the same department/section must declare the relationship to their Line Manager, who will ensure that this is reported to People Services. In addition, any personal relationship between a manager/supervisor and an employee, whom they supervise, must be declared to the manager/supervisor's line manager. Declarations of this nature must be submitted directly to People Services for recording rather than to Governance (see [Figure 1](#) regarding declarations relating to personal relationships of/with an employee).

An employee who has a personal relationship with another employee working in a different department/section must also declare the relationship to their Line Manager where there could potentially be a conflict of interest. For example, with regards to recruitment panels, grading or promotion decisions, approval of timesheets, expense claims or purchases.

An employee who has a personal relationship with a client (including a current student), customer, contractor or supplier must declare the relationship to their Line Manager if the employee's job allows their authority over the client, customer, contractor or supplier.

Any information declared regarding a personal relationship must be reported to People Services by the Line Manager and will be recorded but treated in strict confidence. People

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<sup>1</sup> For the purpose of this policy, a personal relationship is defined as (i) a family relationship; (ii) a business/commercial/financial relationship or (iii) a romantic/sexual relationship

Services will ensure that relevant information is provided to other individuals only when necessary.

Members of Court should declare any personal relationships with employees or students of the University, or anyone else connected to the University to the Secretary to Court.

## 5.2 Activities giving rise to Conflicts of Interest

- spinouts and other companies in which University Members have an interest<sup>†</sup>;
- intellectual property;
- procurement (including evaluation panels, engagement with external suppliers, and purchasing decisions); refer to local Procurement Conflict of Interest protocols;
- complex commercial transactions and arrangements;
- conduct and funding of research;
- external activities and appointments<sup>†</sup>;
- examining and assessment;
- admissions; and
- recruitment.

<sup>†</sup> as per employee terms and conditions, you may not, whether on your own behalf or for any third party, undertake or agree to undertake any other paid or unpaid employment, office, appointment or work, without the written permission of the University (which shall not be unreasonably withheld). Such request for permission should be submitted to the People Services with a copy to their line manager and the relevant member of the Senior Management Team.

## 5.3 Non-financial Conflicts of Interest

Non-financial interests can also come into conflict, or be perceived to come into conflict, with a University members duties, obligations or commitments to the University. Such non-financial interests may include any benefit or advantage, including, but not limited to, direct or indirect enhancement of an individual's career or education, or gain to immediate family (or a person with whom the person has a close personal relationship).

Ensuring that these conflicts of interest do not result in decisions or actions that can be called into question is particularly important for business propriety, supporting the University's charitable status, and conducting research that conforms to the expected ethical and academic standards. In order to identify potential conflicts of interest, University Members should consider who they are acting for, and whether there are any

competing motivations or interests that could influence them or be seen to influence them.

#### **5.4 Financial Conflicts of Interest**

A financial conflict of interest, for the purposes of this Policy, is one where there is or appears to be opportunity for personal financial gain, financial gain to close relatives or close friends, or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions.

A conflict will arise if the financial interest might provide, or be reasonably seen by others to provide, an incentive to the individual which affects their actions and where they have the opportunity to affect a University decision or other activity (because for example they are the decision-maker or the principal investigator on a research project).

'Financial gain' or 'financial interest' means anything that has monetary value, including but not limited to:

- payments;
- benefits in kind;
- hospitality and/or gifts;
- forgiveness of debt;
- discounts, bonuses or other favourable contract terms;
- equity interests (e.g. stocks, stock options or other ownership interests); and/or
- intellectual property rights (e.g. patents, copyrights and royalties from such rights).

The level of financial interest is not the determining factor as to whether a conflict should be disclosed. What might be 'not material' or 'not significant' in one set of circumstances might be very significant in another. Good practice in many situations will mean the declaration of 'any' financial interest, however small.

An example of a financial conflict of interests which should be avoided rather than managed is that members of the University should not offer paid services to student applicants that are additional to their work for the University.

#### **6. Declaring and Managing Conflicts of Interest**

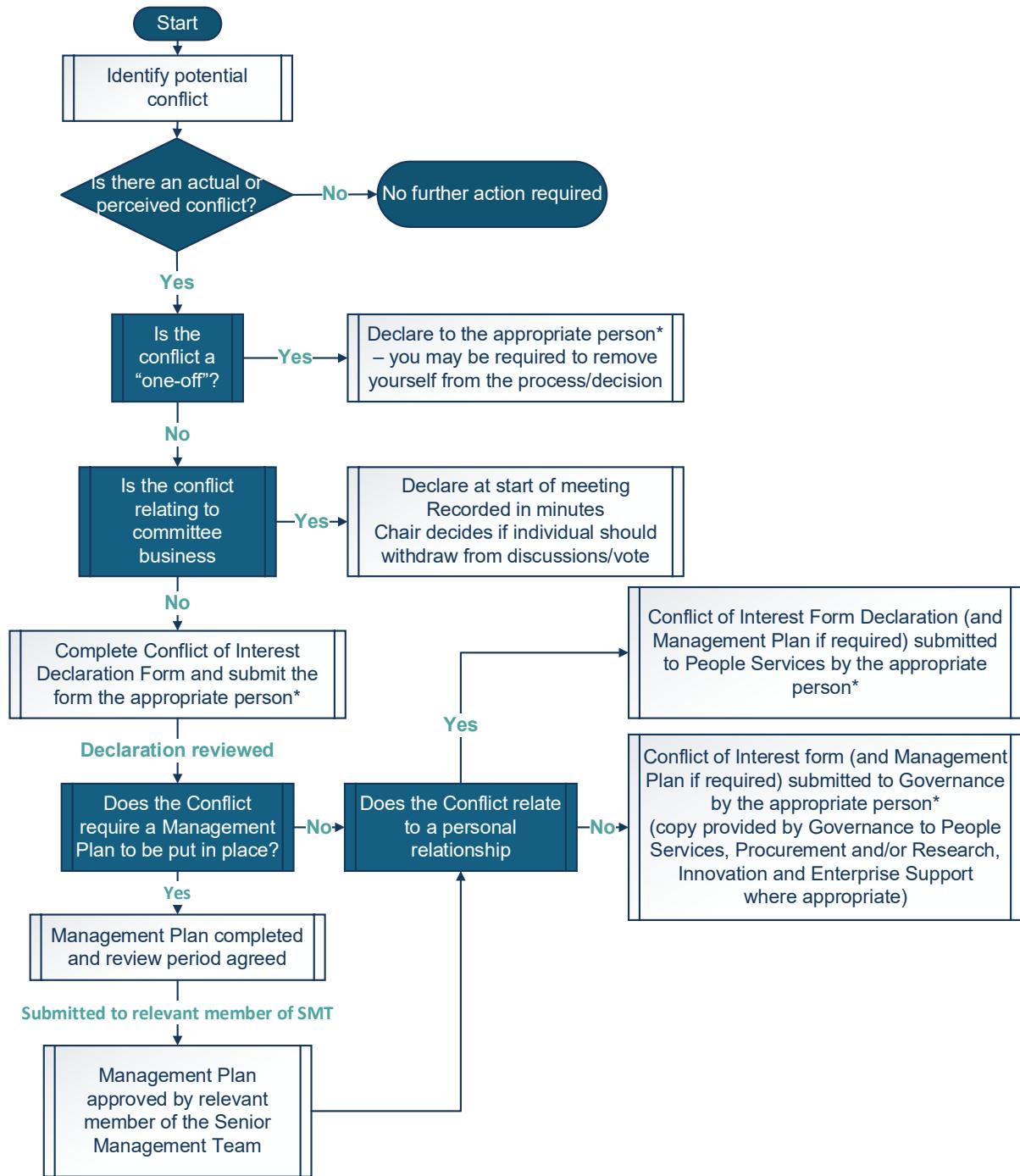
It is the duty of every member of the University community to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest.

## 6.1 Declaring to the Appropriate Person

The general rule, with the exception of committee business is that disclosure should be made at the time the conflict first arises, or it is recognised that a conflict might be perceived, in writing to the “**Appropriate Person/s**”.

- **staff** should discuss the relevant issues with their Line Manager, who, where appropriate will consult with the relevant member of the Senior Management Team. If they have an interest in the matter to be discussed, the declaration must be made to the person at the next higher level of authority. For members of the Senior Management Team, the line of approval is to the Principal and Vice-Chancellor. The Principal and Vice-Chancellor would be required to declare any potential conflicts to the Chair of Court. The procedure for declaring and managing conflicts of interest for staff is summarised in [Figure 1](#).
- **students (undergraduate and taught postgraduate)** should discuss the relevant issues with their Programme Lead, who, where appropriate, will consult with the Head of Department and/or Dean of Faculty before an approach for dealing with the conflict is agreed.
- **postgraduate research students** should discuss the relevant issues with their project supervisor. Where the conflict of interest arises between the interests of the supervisor and the student, the student should discuss the matter with the Dean of Research and the Graduate School and the appropriate Dean of Faculty.
- **members of Court** should discuss any potential or actual conflicts with the Secretary. If the conflict of interest includes the Secretary, this should be raised with the Chair of Court.

Committee chairs, members and attending officers in addition to individuals acting in accordance with the policy, governance of the University must also be conducted with close regard to the risks of financial and non-financial conflicts of interest. Committees are required to adopt the practice of including a similar statement to the following in each agenda: “Members and regular attendees of [Name] Committee will be asked to declare any interest that could give rise to conflict in relation to any item on the agenda as part of the preliminary matters. All interests so disclosed will be recorded in the minutes of the Committee. If the Chair deems it appropriate, the member shall absent themselves from all or part of the Committee’s discussion of the matter.”



**Figure 1: Flowchart summarising the procedure for employees for declaring and managing conflicts of interest.**

## 6.2 Completion of a Conflict of Interest Declaration Form (staff only)

Once an employee have declared the conflict as noted above, they may be asked to complete the University's **Conflict of Interest Declaration Form**. In areas where statutory or regulatory requirements apply (such as Procurement), additional or alternative forms

may be in place. For example, the Procurement department issues a declaration of Interest and Confidentiality Agreement, accompanied by a Privacy Notice, in accordance with the Public Contracts (Scotland) Regulations 2015. Some instances will require more than just declaration and will need to be dealt with by agreeing how the conflict can be actively managed and you may also be required to complete a **Management Plan**, which is captured on the declaration form.

One or more of the following strategies may be appropriate to manage the conflict of interest:

- not taking part in discussions of certain matters;
- not taking part in decisions in relation to certain matters;
- referring to others certain matters for decision;
- not acting as a particular person's supervisor or examiner;
- divesting or placing in trust certain financial interests;
- publishing a notice of interest;
- standing aside from any involvement in a particular project; and/or
- declaring an interest to a sponsor or third party.
- declaring a conflict to a sponsor or third party.

The approach adopted should be documented and copies provided to the relevant parties. If the above or other strategies are not sufficient to manage a particular conflict, it should be avoided. Further guidance can be sought at any time from the Vice-Principal and University Secretary.

Additional steps are required in certain circumstances. These are outlined in [Appendix 2](#) (and relate to research students receiving support from a company in which their supervisor has a financial interest or where results or IP are related to company activity, as well as any other research carried out by staff or students who have financial interests in a company working in the same area; involvement in spinouts and other external ventures; and the sale, supply or purchase of goods/services).

## 7. Monitoring and Reporting of Declared Conflicts of Interest (staff only)

Copies of the University's Conflict of Interest Declaration Form (and associated Management Plans) are held in a central repository managed by Governance\* and shared with relevant parties such as Peoples Services, Procurement and/or Research Innovation and Enterprise Support and provided to the Senior Management Team on request.

\* If the conflict relates to a personal relationship of/with an employee these should be shared directly with People Services as these are stored outwith the Governance managed central repository.

It is the responsibility of the Appropriate Person (see [Section 6.1](#)) to ensure that a copy is submitted to [Governance@abertay.ac.uk](mailto:Governance@abertay.ac.uk). The form also contains a Management Plan, which requires to be approved by the relevant member of the Senior Management Team.

There are, however, some particular instances where the general procedure is varied and further specific steps are required such that approval is obtained not only from the appropriate person but from a relevant member of the Senior Management Team. It is the responsibility of those affected to comply with the management approach that has been agreed.

Any unresolved matter shall be referred to the Vice-Principal and University Secretary for advice. In cases of particular difficulty, they will seek appropriate advice.

## 8. Annual Declaration of Conflicts of Interest

In addition to declaring any conflict or potential conflict, the following postholders are required to submit an annual declaration of interests to Governance.

- members of Court
- secretary to Court
- officers closely related to Court

These are published on the University's website at [Court Members | Members of Court | Abertay University](#). A copy of the guidance for Members of Court is provided in [Appendix 3](#).

## 9. Undisclosed Interests or Conflicts

As set out above, it is the duty of every university member to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest at the time the conflict first arises, or it is recognised that a conflict might be perceived. If it is discovered that a relevant interest, circumstance or conflict has not been disclosed in line with this policy, individuals may be subject to investigation and, if appropriate, to disciplinary action under the University's Discipline Procedure.

If individuals have doubts or concerns about a potential undisclosed conflict of interests or how an existing conflict is being managed, they should contact the appropriate person (as set out above) or the Vice-Principal and University Secretary.

## 10. Related Policy Documents and Supporting Documents

Legislation	<a href="#">Bribery Act 2010</a> ; <a href="#">Economic Crime and Corporate Transparency Act 2023</a> ; <a href="#">Higher Education Governance Act (2016)</a> ; <a href="#">Public Contracts (Scotland) Regulations 2015</a> ; <a href="#">The Abertay University (Scotland) Order of Council 2019</a>
Strategy	2025-2030 Strategy; Financial Strategy
Policy	Abertay Research Code of Conduct; Anti-Bribery and Corruption Code of Conduct and Policy; Code of Conduct for Members of Court; Financial Regulations; Public Interest Disclosure (Whistleblowing) Policy; University Court Standing Orders; University Court Statement of Primary Responsibilities; Scheme of Delegation; Terms of Reference Research Ethics Committee
Procedures	Discipline Procedure; Grievance Procedure; Public Interest Disclosure (Whistleblowing) Procedure
Guidelines	<a href="#">Scottish Code of Good Higher Education Governance 2023</a> ; <a href="#">The Concordat to Support Research Integrity</a>
Local Protocol	N/A
Forms	Conflicts of Interest Declaration Form; Register of Gifts and Hospitality; Register of Interest; Procurement Conflict of Interest Declaration Form and Confidentiality Agreement; Procurement Declaration of Interest Privacy Notice

## 11. Additional Information

Audience	Public
Applies to	All University Members
Classification	Corporate Governance
Category	University Governance
Subcategory	Conflict of Interest
Approving Authority	University Court
Approval Date	26 November 2025
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Policy Document Author	Head of Governance and Deputy Secretary; Head of the Research Innovation and Enterprise Support
Policy Document Owner	Vice-Principal and University Secretary

For the purposes of this policy and related policy documents, terms are defined in the Policy Document Library Glossary.

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## Appendix 1 Nine Principles of Public Life in Scotland

**Duty:** Holders of public office have a duty to uphold and act in accordance with the law and public trust placed in them as members. Individuals have a duty to act in the interests of the public body of which they are a member and in accordance with the core functions and duties of that body.

**Selflessness:** Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends.

**Integrity:** Holders of public office should not place themselves under any financial obligation to outside individuals or organisations that might influence them in the performance of their official duties.

**Objectivity:** In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

**Accountability and Stewardship:** Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

**Openness:** Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

**Honesty:** Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

**Leadership:** Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

**Respect:** Holders of public office must respect fellow members and employees of the public body and the role each play, treating them with courtesy at all times. Similarly, holders of public office must respect members of the public when performing duties as a member of their public body.

## Appendix 2- Procedure: Additional Steps required in Specific Circumstances as a Variance to the General Rule

### General Rule

As explained in [section 7](#), the general rule is that disclosure should be made “at the time the conflict first arises, or it is recognised that a conflict might be perceived, in writing to the appropriate person as set out in [section 6.1](#). If they have an interest in the matter to be discussed, the disclosure shall be made to the person at the next higher level of authority. For member of the Senior Management Team the line of approval is to the Principal and Vice-Chancellor, whereas for the Principal and Vice-Chancellor this is the Chair of Court. However, in some circumstances, the procedure is slightly different. These are set out below:

### Research

Where any researcher has a conflict of interest, they must also comply with the following:

#### Grant application submissions

To assist the assessment of situations which could lead to a real or perceived conflict of interest at the stage of applying for a research grant, or negotiating a contract, the University requires researchers to clarify whether they have any personal interest (shareholding, consultancy, directorship, etc.) in relation to the proposed sponsor. This is declared to the RIES team when submitting applications for external research funding.

#### Ethics

Researchers must also comply with specific declaration requirements as laid down by the University Research Ethics Committee. Researchers should contact the relevant Local Ethics Committee if they have questions about those requirements

#### Requirements of funding bodies

Some funding agencies set requirements relating to conflict of interest. They may, for example, require direct notification of certain interests to them; reserve the right to review the proposed plan for managing the conflict of interest; and/or prohibit grant holders from undertaking certain activities. Researchers need to be aware of and comply with those specific requirements. Researchers should contact Research, Innovation and Enterprise Services (RIES) at [funding@abertay.ac.uk](mailto:funding@abertay.ac.uk) if they wish to seek advice on any aspect of funding terms and conditions.

## **Financial interest in a company that is involved in an area related to an individual's academic work**

Academic staff who have a financial interest in a company that may reasonably appear to be affected by the results of a proposed research project must disclose that interest and put to the relevant member of SMT for review and approval, a conflict of interest plan/approach designed to protect the integrity of the research and the reputation of the academic(s), their research group(s) and the University. The member of SMT should also review and approve the conflict of interest management plan/approach. The circumstances determine whether there is a conflict of interest, not the outcome<sup>2</sup>.

## **Postgraduate research student financial support**

To preserve the integrity of the research, if a postgraduate research student is receiving support from a company in which their supervisor has a financial interest - or where the outcomes of the research are related to the activities of such a company - then the student and their supervisor must disclose the conflict to both the Dean of Faculty and the Dean of Research and the Graduate School for review and approval of a conflict of interest plan/approach.

## **External companies (including spinouts, startups, and licensees of University IP)**

University members may have a financial interest or other personal interest in a spinout, startup or other organisation with a connection to their University responsibilities, academic environment and/or work, or in an organisation to which the University has licensed or is seeking to license University Intellectual Property. Staff may have personal Intellectual Property or expertise with which they are intending to create a startup company with a connection to their academic environment and work. In such cases they should normally play no executive role in any decisions made between the University or its subsidiaries and such external companies. If it is believed that there are exceptional circumstances to argue for such involvement, prior permission must be sought from the Dean of Faculty and then from the Vice-Principal and University Secretary.

The proposed conflict of interest plan/approach to be put to the relevant member of SMT and then from the Vice-Principal and University Secretary must aim to protect the reputation of the individual(s), their research group(s) and the University and ensure compliance with company law; and if they wish to undertake a consultancy or other appointment for that company, they must seek prior permission from the relevant member of SMT. The proposed conflict of interest plan/approach to be put to the relevant member of SMT must aim to protect the reputation of the individual(s), their research group(s) and the University and ensure compliance with company law. All those involved

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<sup>2</sup> Kassirer, J.P., and Angel, M., editorial, *N. Eng. J. Med.* 1993; 329:570–1.

must also declare and produce a management plan for conflicts of interest, to be reviewed by RIES and approved by the relevant member of SMT before the completion of the initial investment round.

University members may wish to buy or subscribe for shares or otherwise acquire a financial interest or other personal interest in a spinout, startup or other organisation. If this entity has a connection to their University responsibilities, academic environment and/or work; for example, is sponsoring research in the same department or area of interest, or has licensed or is seeking to license University-generated intellectual property, then, whether or not those shares are listed on a recognized stock exchange:

- They must seek permission in advance from the relevant member of SMT, who in turn should seek advice from the Director of Finance, Infrastructure and Corporate Services where required.
- They must prepare a conflict of interest management plan, to be agreed with the relevant member of SMT before the purchase or acquisition. The proposed conflict of interest plan/approach to be put to the member of SMT must aim to protect the reputation of the individual(s), their coworkers and the University and safeguard their involvement in, or influence over, decision-making in relation to the company in which they wish to hold a financial interest. Individuals should also be alert to the risks of actual or perceived insider dealing.

### **Sale, supply or purchase of goods or services**

University members must ensure the probity of all financial transactions. The sale or supply of goods by the University or the purchase of goods or services by the University must be carried out in accordance with the [University's Financial Regulations](#). University members should not normally be involved in supply or purchase decisions in relation to any external organisation in which they or any members of their family or any person with whom they have a close personal relationship have a financial interest or in any way have the capacity for personal gain. If there are exceptional circumstances that *prima facie* require such involvement, the following process should be followed:

- the person should disclose, in writing to the relevant member of SMT, the nature of the transaction, the potential conflict and the method proposed to manage the conflict;
- they and the relevant member of SMT must formulate a proposed plan/approach that protects the University and ensures compliance with the law and the integrity of the transaction(s) and the individuals involved; and
- the relevant member of SMT must then seek approval of that plan from the Director of Finance, Infrastructure and Corporate Services.

## Appendix 3: Register of Interest Guidance Notes

Members of Court, as individuals, are best placed to determine whether an interest should be declared. When completing the questionnaire, members are required to consider not only their own interests, but also those of their employers, business associates, partner/spouse, children and any other person with whom they might have a beneficial interest. Beneficial interests need not be solely financial.

Any member with doubts about the completion of the questionnaire should contact [governance@abertay.ac.uk](mailto:governance@abertay.ac.uk) for advice.

It may be helpful to members when identifying what interests should be declared, and what level of interest should be considered to be significant, to consider as a 'rule of thumb' the declaration of any interest which, if disclosed in the press, would be likely to cause embarrassment to themselves or to the University.

### Part I

**Paid employment:** Members of Court should declare all paid employment. Members who are employees of the University, such as elected staff representatives and *ex officio* members, do not need to declare this employment.

**Directorships/Board Memberships:** Directorships (and their equivalents on, for example, public service boards) should be declared whether the position is remunerated or not.

**Significant involvement with Organisations:** This section is designed to cover any other cases of significant involvement which may not be easily described under sections above.

**Positions of Authority:** Members of Court should declare at this point any positions of authority which they hold in organisations, such as Training and Enterprise Councils, Trade Unions, Local Authorities etc., where they might be required to participate in decision making which could affect the University's interests and which could give rise to duality or conflict of interest.

### Part II

**Significant Pecuniary Interests:** Any other significant pecuniary interest should be declared under this section. For guidance, it is likely that such interests would include instances where a member of Court or any other person with whom they might have a beneficial interest has:

- a) a direct pecuniary interest in the supply of goods or services to the University; or
- b) a beneficial interest in the securities or shares of a company or other body which is, or is likely to become, involved in the supply of goods or services to the University.