



Lincoln Bishop University

Document Administration

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CONFLICT OF INTEREST POLICY

VERSION CONTROL TABLE

<u>Version Number</u>	<u>Date Authorised</u>	<u>Summary of Key Changes</u>
1.0	24 July 2026	Policy first introduced and approved by Policy Committee

CONFLICT OF INTEREST POLICY

1. PURPOSE

- 1.1. Lincoln Bishop University is committed to maintaining the highest standards of integrity, transparency, accountability and public trust in all its activities.
- 1.2. Conflicts of interest may arise where an individual's personal interests, external activities, or relationships could influence, or be perceived to influence, their judgement or actions in relation to the University.
- 1.3. The purpose of this Policy is to help staff, students, governors, committee members and others working for or on behalf of the University to:
 - 1.3.1. recognise actual, potential and perceived conflicts of interest;
 - 1.3.2. disclose conflicts promptly and appropriately;
 - 1.3.3. avoid conflicts where they cannot be managed; and
 - 1.3.4. manage conflicts effectively.
- 1.4. Properly identifying and managing conflicts of interest helps protect:
 - 1.4.1. the University's integrity and reputation;
 - 1.4.2. the interests of students, staff and governors;
 - 1.4.3. the fairness of decision-making;
 - 1.4.4. compliance with legal, regulatory and ethical obligations; and
 - 1.4.5. public confidence in the University.

2. SCOPE

- 2.1. This Policy applies to:
 - 2.1.1. all staff of Lincoln Bishop University;
 - 2.1.2. all students;
 - 2.1.3. governors and members of Council and committees;
 - 2.1.4. members of the Senior Leadership Team;
 - 2.1.5. external examiners, assessors and advisers;
 - 2.1.6. contractors, consultants, agency staff and other individuals working for or on behalf of the University; and
 - 2.1.7. staff and directors of subsidiary companies, joint ventures or associated bodies where relevant.
- 2.2. This Policy applies to activities undertaken:
 - 2.2.1. within the University;
 - 2.2.2. on behalf of the University;
 - 2.2.3. in connection with University business; and
 - 2.2.4. in any external role or activity that may create a conflict with University responsibilities.



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3. DEFINITION OF A CONFLICT OF INTEREST

- 3.1. A conflict of interest is a situation in which an individual's duties or responsibilities to the University are, or could be, compromised by a secondary interest.
- 3.2. A conflict may be:
 - 3.2.1. **actual** – where a conflict already exists;
 - 3.2.2. **potential** – where a conflict may arise in the future; or
 - 3.2.3. **perceived** – where others might reasonably think a conflict exists, even if it does not.
- 3.3. Conflicts of interest may be:
 - 3.3.1. **financial** – for example, where an individual may gain financially directly or indirectly;
 - 3.3.2. **non-financial** – for example, where an individual may gain a personal, professional or relational advantage; or
 - 3.3.3. both.
- 3.4. Conflicts may arise from:
 - 3.4.1. external employment or appointments;
 - 3.4.2. consultancy or business interests;
 - 3.4.3. family or close personal relationships;
 - 3.4.4. membership of boards, committees or governing bodies;
 - 3.4.5. research, procurement, admissions, recruitment, assessment or examination activities;
 - 3.4.6. gifts, hospitality or benefits; and
 - 3.4.7. ownership of shared, intellectual property or other commercial interests.

4. PRINCIPLES

- 4.1. All individuals covered by this Policy must act in the best interests of the University.
- 4.2. Individuals must not allow personal interests to improperly influence, or appear to influence, University decisions or actions.
- 4.3. Where a conflict exists, the University will seek to manage it in a proportionate, transparent and documented way.
- 4.4. If a conflict cannot be appropriately managed, the individual must not participate in the relevant activity.



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- 4.5. Failure to disclose or manage a conflict of interest may result in disciplinary action or other appropriate action.

5. RESPONSIBILITIES

5.1. Individuals

5.1.1. Each individual covered by this Policy is responsible for:

- i. recognising situations that may give rise to a conflict of interest;
- ii. declaring actual, potential or perceived conflicts promptly;
- iii. cooperating with any agreed management plan;
- iv. updating declarations if circumstances change; and
- v. seeking advice if unsure whether a conflict exists.

5.2. Line Managers/Heads of Department/Equivalent Managers

5.2.1. Managers are responsible for:

- i. ensuring staff are aware of this Policy;
- ii. considering disclosures and agreeing appropriate management actions;
- iii. keeping records of declarations and management plans; and
- iv. escalating complex or unresolved matters where necessary.

5.3. Committee Chairs

5.3.1. Committee Chairs are responsible for:

- i. ensuring conflicts are declared at the start of meetings and when relevant items arise;
- ii. deciding whether an individual may remain in the meeting, contribute to discussion, or withdraw; and
- iii. ensuring declarations and actions are recorded in the minutes.

5.4. Senior Leadership/Governance Leads

5.4.1. Senior leaders and governance leads are responsible for:

- i. promoting a culture of openness and integrity;
- ii. ensuring appropriate systems are in place for declarations, recording and review; and
- iii. overseeing compliance with this Policy.

6. DECLARING A CONFLICT OF INTEREST

- 6.1. Individuals must declare any conflict of interest as soon as they become aware of it, or as soon as they reasonably ought to have become aware of it.



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- 6.2. Declarations should normally be made:
 - 6.2.1. in writing to the relevant manager, chair or designated officer; or
 - 6.2.2. verbally at a meeting, followed by a written record where appropriate.
- 6.3. Where a conflict relates to committee or board business, the declaration should be made at the start of the meeting or before the relevant agenda item is discussed.
- 6.4. If the relevant manager or chair also has an interest in the matter, the declaration should be made to the next appropriate level of authority.
- 6.5. Individuals should seek advice if they are unsure whether a situation constitutes a conflict of interest.

7. MANAGING CONFLICTS OF INTEREST

- 7.1. Depending on the nature and seriousness of the conflict, one or more of the following measures may be used:
 - 7.1.1. recording the conflict in a register;
 - 7.1.2. excluding the individual from part or all of a discussion;
 - 7.1.3. excluding the individual from decision-making;
 - 7.1.4. reallocating responsibilities;
 - 7.1.5. placing restrictions on access to information;
 - 7.1.6. requiring the individual to withdraw from a procurement, recruitment, admissions or research process;
 - 7.1.7. requiring the individual to divest a financial interest; or
 - 7.1.8. taking any other proportionate action necessary to protect the University's interests.
- 7.2. Any management action should be:
 - 7.2.1. documented;
 - 7.2.2. communicated to relevant parties;
 - 7.2.3. reviewed where necessary; and
 - 7.2.4. kept under regular review.
- 7.3. Where a conflict cannot be managed appropriately, the individual must not take part in the relevant matter.

8. REGISTERS AND RECORDS

- 8.1. The University will maintain appropriate records of declared interests and conflict management actions.

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- 8.2. Records may include:
- 8.2.1. the nature of the interest;
 - 8.2.2. the date of declaration;
 - 8.2.3. the decision taken;
 - 8.2.4. the management action agreed; and
 - 8.2.5. any review or follow-up action.
- 8.3. Where required, individuals may be asked to complete an annual declaration of interests.
- 8.4. Records will be retained and handled in accordance with the University's data protection and records management requirements.

9. COMMON SITUATIONS WHERE CONFLICTS MAY ARISE

- 9.1. Conflicts of interest may arise in a range of situations, including but not limited to:
- 9.1.1. procurement and purchasing;
 - 9.1.2. recruitment and selection;
 - 9.1.3. admissions;
 - 9.1.4. assessment and examination;
 - 9.1.5. research and funding applications;
 - 9.1.6. consultancy and external appointments;
 - 9.1.7. gifts and hospitality;
 - 9.1.8. personal relationships in the workplace or learning environment;
 - 9.1.9. use of University information or resources for private gain; and
 - 9.1.10. commercialisation of intellectual property.
- 9.2. This list is not exhaustive. Individuals should consider whether any external interest, relationship or activity could influence, or be seen to influence, their University responsibilities.

10. GIFTS AND HOSPITALITY

- 10.1. Gifts, hospitality or other benefits must not be accepted where they could influence, or appear to influence, University decisions or actions.
- 10.2. Modest and proportionate hospitality may be acceptable where it is clearly reasonable and does not create a conflict of interest or perception of bias.
- 10.3. Any gift or hospitality that could reasonably be seen as creating a conflict should be declared and recorded in accordance with University procedures.



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11. RESEARCH AND COMMERCIAL ACTIVITIES

- 11.1. Individuals involved in research, consultancy, enterprise or commercial activities must ensure that conflicts of interest are identified and managed before activity begins.
- 11.2. Particular care must be taken where:
 - 11.2.1. research is funded by an external organisation with which the individual has a connection;
 - 11.2.2. an individual has a financial interest in a company related to the research;
 - 11.2.3. University intellectual property may be commercialised; or
 - 11.2.4. a spin-out, start-up or similar venture is involved.
- 11.3. Where relevant, additional approvals or management plans may be required before the activity proceeds.

12. PROCUREMENT, RECRUITMENT, ADMISSIONS AND ASSESSMENT

- 12.1. Individuals involved in procurement, recruitment, admissions, assessment or examination must declare any conflict that could affect fairness, objectivity or impartiality.
- 12.2. Individuals with a conflict must not participate in decisions where their involvement could compromise, or appear to compromise, the integrity of the process.
- 12.3. Where appropriate, the University may require the individual to withdraw from the process entirely.

13. BREACHES OF THIS POLICY

- 13.1. Failure to disclose a conflict of interest, failure to comply with an agreed management plan, or deliberate concealment of relevant information may be treated as misconduct.
- 13.2. The University may take disciplinary, contractual, governance or other appropriate action where this Policy is breached.



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14. ADVICE AND SUPPORT

14.1. Individuals who are unsure whether a conflict exists, or how it should be managed, should seek advice from:

- 14.1.1. their line manager;
- 14.1.2. their Head of Department or equivalent;
- 14.1.3. the relevant committee chair; or
- 14.1.4. the University's designated governance, legal, compliance or HR contact.

14.2. The University may issue supporting guidance, forms and examples to assist with implementation of this Policy.

15. REVIEW

15.1. This Policy will be reviewed periodically and updated as necessary to reflect changes in legislation, regulation, governance arrangements and good practice.

15.2. The review cycle will be determined by the University.