



**International  
Growth Centre**

## **DECLARATION OF INTERESTS 2022 FREQUENTLY ASKED QUESTIONS**

### **Who is required to declare interests?**

Country Directors will be asked to complete a declaration form and will receive full details by email.

All staff employed directly by LSE should complete the declarations of interest on MyView where they have any interests that should be declared or will be participating in a recruitment panel.

### **Why am I being asked to declare interests?**

To enable the LSE and IGC to understand and manage any potential risks to the IGC and the School.

### **What is an 'interest'?**

An interest can be a financial or non-financial. Financial interests include remuneration (such as pay, commission, consultancy) and assets (investments, stocks, bonds, property). Non-financial interests include enhancement of career or reputation, access to privileged information or facilities.

### **When does an 'interest' become a 'conflict'?**

Many of these interests will not compete with your duties and responsibilities to IGC. However, where your obligations to IGC are, or may appear, to be compromised, a conflict of interests occurs. A conflict of interest may arise where an individual might be seen to be influencing IGC matters for actual, potential or perceived personal benefit. Such a conflict may arise in a situation when a member of our community is in a position to influence, directly or indirectly, IGC business, research or other decisions in ways that could lead to gain for them, their family or others.

### **What is a 'conflict of interest'?**

A Conflict of Interest arises where you owe separate duties to act in the best interests of the IGC and another body, association or an affiliation in relation to the same or related matters, and those duties are incompatible, or there is a significant risk that those duties may be incompatible.

In particular, a Conflict of Interest is where an individual could be seen to be influencing IGC matters for actual or potential personal benefit. Such a conflict arises, for instance, when a member of staff is in a position to influence, directly or indirectly, IGC business, research or other decisions in ways that could lead to gain for them, their family or others to the detriment of the IGC's integrity and its missions.

No one should be involved in making decisions on IGC matters from which they, or anyone with whom they have a close financial or personal relationship, stand to

benefit. "Benefit" may relate to financial gain, career advancement or some other form of betterment, influence or privilege. This applies to any IGC activities.

It is important to note that while the individual concerned may not detect any Conflict of Interest, they should also consider the perspective of an independent external observer and whether they would *perceive there to be a possible* Conflict of Interest.

In relation to commitments outside of the IGC that may create conflict, please note that you should ensure that this is in line with the Terms and Conditions of your contract. Should you have any queries, please contact your appropriate senior management team member at the Hub in London.

Conflicts can be managed much more readily if the IGC is made aware of them. If you are asked to participate in making a decision on IGC business which might affect you or those associated with you in another capacity, you should declare your interest in the matter. You may be asked not to participate in the relevant process, discussion or decision.

Some more examples of conflicts of Interest:

1. A relative or close friend of a manager reports directly to them. The manager is responsible for determining their job responsibilities, pay and promotions.
2. A manager is in a relationship with an employee who reports to them.
3. A member of an interview panel or a review panel is a relative or close friend of one of the applicants and fails to disclose the relationship.
4. A member of staff involved in procurement of services selects the business of a family member to provide services to the IGC.
5. Where outside interests or commitments conflict with the role or commitments to the IGC.
6. The use of the IGC's facilities to pursue external business or consulting activities.
7. A member of staff also serves on the Board of a funding body that is considering an application from the IGC.
8. A researcher has an interest in an organisation for which they are conducting research.
9. Involvement of a close friend, relative or partner in a research contract.

**Once I've completed the Declaration of Interests, does that mean I don't have to declare anything during the course of the year?**

No. Whilst the annual exercise is important, it does not replace the need for staff to declare other relevant interests as they arise. For example, if you are at a meeting where the IGC's relationship with a particular supplier is discussed, and your partner works for that company, this should be declared even if the School already holds the information through your survey response.

Declaring conflicts such as the one described as they become apparent is essential if the process is to be effective. No one should participate in a decision in which they have a conflict of interests or might be seen to exercise bias. Instead, you should

make the declaration and abstain from the decision taken. By failing to do so, you could be putting both yourself and the IGC at risk of future criticism.

Not all conflicts of interest arise from committee business. Staff involved in competitive tenders and working with suppliers and other contractors need to be particularly aware of the possibility of conflicts of interest so that these can be avoided. For further information, please contact Solmaz Kolahi, Senior HR Adviser (IGC); [S.Kolahi@lse.ac.uk](mailto:S.Kolahi@lse.ac.uk).

**What do I do if my circumstances change during the course of the year, and I have something new to declare?**

You can update your annual declaration during the year as the need arises by notifying Solmaz Kolahi, Senior HR Adviser (IGC); [S.Kolahi@lse.ac.uk](mailto:S.Kolahi@lse.ac.uk).

**How is the Declaration of Interests carried out?**

The survey is administered by IGC using the Qualtrics online survey design tool. Qualtrics is the London School of Economics preferred survey package and is used by over 1,300 universities globally. Qualtrics security statement can be found here: <http://www.qualtrics.com/security-statement/>

**How will my data be stored and who will have access to it?**

We take data security very seriously. The School complies with Data Protection legislation (GDPR). Survey responses are stored in a secure, password controlled section of a networked drive. Access to the data is limited. Data is used to respond to specific queries such as requested by the School's auditors.

**How will my data be used?**

Survey data will only be used for the purposes of ensuring compliance with the IGC's legal, regulatory and ethical framework. For example, a list of companies will be provided to Procurement. If a member of staff activated the IGC's 'whistleblowing' procedures to report alleged fraud involving a third party supplier, a search might be performed against the company name. Similarly, a change in world events might cause the IGC to examine the totality of its activities in a particular country or region; or allegations of corruption might prompt the IGC to examine links with a particular organisation or individual.

**Will my data be made available to third parties?**

Generally speaking, personal information provided in the survey cannot be made publicly available without the consent of the individual concerned. In a limited number of cases the IGC may be required to share data with regulatory or investigatory authorities. Data may be requested by third parties under the Freedom of Information Act 2001, but the Act provides considerable protection for individuals. Section 40 of the Freedom of Information Act 2001 contains a number of exemptions regarding the release of personal data, the most relevant of which is 'fairness' i.e. would it be fair to the individual in question if the data requested relating to them was released into the public domain.

In the unlikely event of a third party seeking information about your survey entry, the London School of Economics Information and Records Manager would carefully examine the circumstances of the case against the 'fairness' test, following which it

would be reviewed by the School Secretary. If you require further information, please contact the Records and Information Management Team; [glpd.Info.Rights@lse.ac.uk](mailto:glpd.Info.Rights@lse.ac.uk).

**I've read this guidance but still have questions about how to complete the form?**

**Who can I contact?**

If you have any further queries on how to complete the Declaration of Interests form, please contact Solmaz Kolahi, Senior HR Adviser (IGC); [S.Kolahi@lse.ac.uk](mailto:S.Kolahi@lse.ac.uk).