

# **DECLARATIONS OF INTEREST GUIDANCE**

## INTRODUCTION

Registering interests is one of the key ways we uphold our commitment to integrity, as outlined in the School's <u>Ethics Code</u>.

The purpose of declaring interests is not to discourage involvement with external organisations, but to ensure that any such interests are transparently disclosed and appropriately managed. This helps prevent conflicts of interest—whether actual, potential, or perceived.

In many cases, external interests will not conflict with your duties at the School. However, a conflict of interest arises when your obligations to the School are—or could reasonably be seen to be—compromised. This includes situations where personal interests might influence, or appear to influence, decisions or actions taken on behalf of the School.

For further guidance, please refer to the Conflicts of Interest Policy.

### WHO NEEDS TO COMPLETE A DECLARATION?

New staff: We advise all new staff to complete a declaration as part of their induction.

**Staff who have an outside interest:** All staff should complete a declaration as and when any interests arise or change.

**Decision making panels:** Where staff are involved in staff recruitment panels or procurement panels, they should ensure they have completed a declaration.

**Particular groups of staff:** Some staff are also required to complete a declaration annually, even when they have no interests to declare. These groups of staff include:

- Staff at grade 10 and above
- SMC Members
- Department/Institute/Research Centre Managers
- Senior staff in Professional Services Divisions

We will communicate annually to all staff required to complete an annual declaration with a reminder to do so.

#### WHAT SHOULD I DECLARE?

You should declare:

- Any roles in other organisations (including other universities) including employment, consultancy, board membership, company director or charity trusteeships.
- Personal relationships with others working or studying at the School, or a personal relationship with someone who has a contract supplying services to the School.



- Any property which you rent, lease or sell to or from the School.
- Any grants or donations that have not been received through the usual School processes.

Further information on what you should declare, and what does not need to be included in your declaration is included in the table below.

You should declare your interests as and when they change. You can do this on the School's <u>MyHR system</u>. You should not wait for a reminder or the annual declaration in order to update your interests.

## WHAT SHOULD I DO AFTER COMPLETING MY DECLARATION?

All staff should complete a Declaration of Interest form and inform their Head of Division or Department where they have an interest that may conflict with their role at the School. Whilst the declaration is important, it does not replace the need for all staff to declare other relevant interests as they arise. For example, if you are at a meeting where the School'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 declaration response.

## WHAT SHOULD LINE MANAGERS DO IN RELATION TO DECLARATIONS MADE?

Line managers should review all declarations of interests from staff that they manage. Information on how managers can access declaration of interest forms can be found <u>here</u>. All declared actual, potential or perceived conflicts of interests should be reviewed and considered by the Head of Division or Department or Committee Chair (as appropriate). Further information can be found in section 8 and 9 of the <u>Conflicts of Interest Policy</u>.

## HOW TO MAKE YOUR DECLARATION

You can make a declaration of interests at any time using the <u>MyHR system</u>. Information on how to access the form in MyHR can be found <u>here</u>.

## **USEFUL INFORMATION**

- <u>Conflicts of Interest Policy</u>
- Personal Relationships Policy and Procedure
- MyHR Guidance on Declarations of Interest
- Guidance for Managers on Accessing Declaration of Interest Forms
- Gifts and Hospitality Policy and Procedure
- Ethics Webpages



What you should declare	What you don't need to declare
Organisations	Organisations
<ul> <li>Any non-LSE employment or remunerated roles (regardless of the type of organisation). This includes consultancy work.</li> <li>Acting as an external examiner for another institution (there is a specific question on this).</li> <li>Board membership, charity trusteeship and school governorship (even if they are unpaid).</li> <li>Company ownership or major shareholdings (above 3% of issued capital)</li> <li>Royalties from books.</li> <li>Any current or future roles (if known) as an external examiner at another university/HEI.</li> <li>Any family member working for a company providing goods or services to the School or one of LSE's subsidiary companies.</li> </ul>	•
Personal relationships	
<ul> <li>Any family member working or studying at the School</li> <li>A romantic/intimate/sexual relationship with an employee or student of the School</li> <li>Close personal or social friendship or a financial or commercial/business relationships with another colleague.</li> <li>Note: Personal relationships should be declared on the 'Personal Relationships at Work' form in MyHR.</li> </ul>	
<ul> <li>Property</li> <li>Any property or land which you, or an organisation you are involved with, rent, lease or sell from or to the School.</li> <li>Any land or property which you, or an organisation you are involved with, is planning to rent, lease or sell to or from the School.</li> </ul>	<ul> <li>Any property you own rent or lease, if there is no relationship to the School or any of its subsidiary companies.</li> </ul>
<ul> <li>Grants and Donations</li> <li>Any grant or donation that has not come via PAGE or the Research Division.</li> </ul>	
<ul> <li>Other existing, potential or future interests</li> <li>Any appointments made but not yet formally commended.</li> <li>Any other interests which could present a conflict for the School and not included above.</li> </ul>	



## **Frequently Asked Questions**

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

The School's Conflict of Interests Policy supports the LSE Ethics Code, in particular, the School's commitment to integrity, by encouraging the declaration of conflicts of relevant interests so that they may be appropriately managed.

#### What is an interest?

An interest can be a financial or non-financial interest. A list of interests that should be declared is included above. All relevant interests listed above should be declared, even if there is no conflict.

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

As outlined in the School's Conflict of Interests Policy, a conflict of interest arises when there is an actual, potential, or perceived conflict between an individual's duty to act in the best interests of the School and their commitments—formal or informal—to another organisation, body, or affiliation. This conflict occurs when obligations to both parties relate to the same or connected matters and cannot be fulfilled without compromising one or the other.

A conflict of interest may arise where an individual might be seen to be influencing School matters for actual or potential personal benefit. For example, a situation where a member of staff is able to influence, directly or indirectly, School business, research or other decisions in ways that could lead to gain for them, their family or others.

No one should be involved in making decisions in relation to their commitments to the School from which they, or anyone with whom they have a close financial or personal relationship, stands to personally benefit. Such considerations apply to a wide range of activities, including, but not restricted to, student admissions, student assessment, disciplinary proceedings, appeals, staff recruitment, staff promotion and remuneration, procurement, and assessing proposed relationships between the School and outside parties.

#### I don't have any interests to declare. Do I still need to complete this?

We recommend all new staff complete a declaration as part of their induction. Those staff who are invited to complete an annual declaration should complete the form, even to confirm you have no interests that require disclosure. If you have nothing to declare the survey should take no more than one minute.

All other staff with no interests do not need to complete the declaration form on MyHR.

### How do I access the declaration form?

The declaration form can be found under here on <u>MyHR</u>. Information on how to access the form in MyHR can be found <u>here</u>.

# 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 declaration is important, it does not replace the need for all staff to declare other relevant interests as they arise. For example, if you are at a meeting where the School'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 declaration response.

Declaring conflicts 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 School at risk. 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 the Procurement Team, Finance Division.

# 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 in MyHR at any point during the year.

#### Why do I need to declare details of personal relationships within the School?

The School understands that personal relationships with fellow colleagues often develop over time and that in the majority of cases, these are positive. However, where there is also a professional relationship in which one member has, or may have influence, over another, it is important that both staff and students are protected from the potential of possible conflicts of interest – either perceived or actual. More details can be found in the <u>Personal</u> <u>Relationships Policy and Procedure</u>.

#### 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 securely. Data is used to respond to specific queries such as requests by the School's auditors. Your managers will have access to this information via MyHR.

#### How will my data be used?

Information from the declarations will only be used for the purposes of ensuring compliance with the School's legal, regulatory and ethical frameworks and to manage any conflicts of interest. For example, if a member of staff activated the School'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 School to examine the totality of its activities in a particular country or region; or allegations of corruption might prompt the School 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 School 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 several 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.



The interests of members of Council, as both company directors and charity trustees are, as they have always been, open to public scrutiny. A summary of declarations from Council and Committee members is published on the website annually.

In the unlikely event of a third-party seeking information about your survey entry, the School's 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, Tel: 020 7955 6481, Email: Ise.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 the Governance and Ethics Manager by email at <a href="mailto:ethics@lse.ac.uk">ethics@lse.ac.uk</a>.

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