



# Declaration of Interests – guidance for employees and non UKRI employees, including board and committee members

## Table of contents

Guidance statement.....	1
Accessibility and inclusion .....	1
1. Definitions.....	1
2. Roles and responsibilities .....	2
3. Declaring and managing interests.....	5
4. Examples of the types of interests which should be declared.....	7
5. Mitigations .....	8
6. Board, council, committee, programme / project boards and advisory groups.....	9
7. Support available .....	10

## Guidance statement

The purpose of the Declaration of Interests (DoI) policy is to ensure that all UKRI employees and non UKRI employees are aware of their responsibilities to declare and manage any potential conflicts of interest, using the relevant guidance and tools provided. The following guidance provides essential detail for UKRI employees and non UKRI employees, including Board and Committee members. There is separate [guidance for assessors of funding applications](#).

## Accessibility and inclusion

UKRI is committed to promoting equality and to ensuring our Declarations of Interest Policy, Guidance and process is fair and accessible to all users. We welcome and encourage you to contact [conflictsofinterest@ukri.org](mailto:conflictsofinterest@ukri.org) with any feedback, queries or concerns.

### 1. Definitions

- 1.1 **Actual conflict** - a set of circumstances where you have a secondary interest that means your ability to act in one role is impaired.
- 1.2 **Band G** - equivalents in the following organisations are:
  - Innovate UK: 2
  - MRC: 2b, 2s
  - NERC: 3
  - Research England: 10 and 11



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- 1.3 **Immediate family** - for the purpose of the UKRI policy, immediate family is, for example, (but without limitation) defined as the spouse/partner, close family member (like siblings or your children) or any other individual living at the same household as yourself or close family members.
- 1.4 **Line manager** – where we refer to line managers, we are referring only to designated UKRI line managers. If you are a non-employee of UKRI and do not have a UKRI line manager, the individual responsible for assessing your declaration of interests will be referred to as a responsible manager.
- 1.5 **Mitigation** – an action which can be taken to remove or the reduce the likelihood of the conflict or reduce the severity or seriousness of the impact, should the conflict occur.
- 1.6 **Nil return** – a declaration which has been completed by an individual who has no interests to declare.
- 1.7 **Perceived conflict** - a set of circumstances where you have a secondary interest that means your ability to act in one role is seen to be (or could be seen to be) impaired.
- 1.8 **Potential conflict** - a set of circumstances where you have a secondary interest that means your ability to act in one role could be impaired (either now or at some point in the future).
- 1.9 **Responsible manager** – refers to any person who is responsible for assessing declarations of interests but is not the individual's line manager (for example, the chair of a board, council, committee or advisory group).
- 1.10 **Secondary assessor** – a person responsible for assessing interests and identifying any conflicts in relation to a secondary / dual role (this is in addition to the assessment carried out for the primary role).
- 1.11 **Secondary / dual role** – those working on behalf of UKRI may perform more than one role. For example, in addition to your primary role you might be asked to become a member of an internal board, committee or advisory group. We would refer to this as a secondary role. For those who work across more than one team or council, perhaps reporting to two different managers, we would refer to this as a dual role.
- 1.12 **Those with delegated authority** - arrangements may be made locally. For example, committee members may submit to the secretariat who will then liaise with the chair for assessment. In this scenario the secretariat would be the person with delegated authority.

## 2. Roles and responsibilities

- 2.1 Employees and non UKRI employees (as defined in the policy statement) are responsible for ensuring that their declarations are always kept up to date. Disclosures should only be required where interests are, or could be perceived as, relevant to the role and responsibilities of the individual.
- 2.2 Interests should be sought and declared upon appointment to UKRI and updated by the individual when circumstances change. If an individual finds themselves in the position where they have, or could be perceived to have, a conflict of interest they must declare it immediately. For contractors, including monitoring service providers, interests should be sought and declared each time they are engaged to undertake work for UKRI.



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- 2.3 Interests must be declared as and when they arise rather than intermittently when prompted by a responsible manager, UKRI Deputy Director Risk and Assurance (DDRA), HR, or Secretariat.
- 2.4 The process for handling declarations of interests differs depending on the individual's role. More details are provided in the roles and responsibilities table at the end of this section.
- 2.5 Where an individual has a secondary / dual role, they should provide a copy of their declaration to all responsible managers for assessment.
- 2.6 As soon as a declaration has been disclosed, it must be assessed and mitigating actions agreed if required.
- 2.7 Individuals assessing a manual disclosure form must send the signed disclosure form to the team responsible for record keeping, as outlined in the roles and responsibilities table at the end of this section.
- 2.8 Each council or UKRI Central Services Directorate will be responsible for recording interests, reviewing, managing and mitigating conflicts within their respective teams throughout the year.
- 2.9 Each council or UKRI Central Services Directorate will update the register and notify the UKRI DDRA, either annually, or, by exception, when there are new appointments or if new interests arise and the Council Executive Chair or the UKRI Central Services Director have concerns or require advice from the DDRA.
- 2.10 The following employees and non UKRI employees are required to review, update and disclose interests relevant to their role and responsibilities annually, or as soon as interests change. In these roles a declaration must be completed even if no interests exist (a nil return):
  - members of the UKRI Board, associated committees and councils, including non-executives
  - UKRI council chairs
  - all employees UKRI band G or equivalent, and above (including Executive Committee members)
  - members of advisory groups, major project or programme boards or those involved in writing business cases.
  - secondees to UKRI from external organisations
  - employees who intend to apply for, or are in receipt of UKRI funding
  - individuals in positions that exercise significant financial control or those involved in decision making processes. Examples include those who:
    - work in recruitment
    - work in contract management - including those determining contract terms or financial terms (particularly in relation to estates contracts and commercial contracts)
    - are involved in high-value procurement (in the evaluation of competing quotations above £50k and in formal tendering)
    - are responsible for grants awards (particularly those who make



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funding decisions or approve grant funding)

- are responsible for board and council appointments

2.11 This list is not exhaustive. If other specific roles exist that have a heightened risk in relation to perceived conflicts of interest, then a declaration must be submitted (including declarations of “nil return”).

2.12 Innovate UK Monitoring Service Providers (MSPs) are sub-contractors working on behalf of UKRI, and as such are covered by the UKRI DoI policy and their contracts. Innovate UK are responsible for ensuring their contract terms and conditions direct them to this. Current contracts refer to policies, guidelines and codes of practice in the IUK DPS document library. Innovate UK are responsible for ensuring this is kept up to date.

## 2.13 Roles and responsibilities table

Role	When to submit a declaration	Person responsible for assessing declaration	Responsible for record keeping
<b>Members of UKRI Board, associated committees and councils, including non-executives</b>	Annually or by exception	Chair of the relevant board, council or committee, or those with delegated authority	Secretariat / local governance team
<b>All employees UKRI band G and above (including executive committee members)</b>	Annually or by exception	Line manager in consultation with the UKRI DDRA or executive chairs as appropriate	UKRI internal controls or council governance team
<b>UKRI council chairs</b>	Annually or by exception	Council Senior Independent Member (SIM) or those with delegated authority.  Note: If a line manager has already assessed the interests a secondary assessment must be completed	Secretariat
<b>Employees who intend to apply for, or are in receipt of UKRI grant funding</b>	By exception	Line manager	UKRI internal controls or council governance team



Role	When to submit a declaration	Person responsible for assessing declaration	Responsible for record keeping
<b>Individuals in positions that exercise significant financial controls or those involved in decision making processes (see examples above at 2.10)</b>	Annually or by exception	Line manager	UKRI internal controls or council governance team
<b>Advisory group members</b>	Annually or by exception	Chair / secretariat of the group or those with delegated authority	Secretariat / local governance team
<b>Members of major project or programme boards or those involved in writing business cases</b>	Annually or by exception	Senior Responsible Owner (SRO) of the project / programme or those with delegated authority	SRO / project or programme manager
<b>Secondees to UKRI from external organisations</b>	Annually or by exception	Line manager	UKRI internal controls or council governance team
<b>All other employees and non UKRI employees</b>	By exception or as required	Line manager / responsible manager	UKRI internal controls or council governance team

### 3. Declaring and managing interests

- 3.1 Where relevant to their role and responsibilities, UKRI employees and non UKRI employees are required to complete a declaration of interest and send to the responsible individual (as detailed in the roles and responsibilities table above).
- 3.2 UKRI has implemented a self-service DoI Portal to support this process. UKRI employees and specific groups of non UKRI employees will have access. Anyone with access should use this portal to make a declaration. Those without access will need to declare using a manual form, which can be requested from your UKRI contact, or by contacting [conflictsofinterest@ukri.org](mailto:conflictsofinterest@ukri.org).



## UK Research and Innovation

3.3 The following sets out how each group should disclose interests:

**Non-executives, including members of the UKRI Board, associated Committees and councils** should submit and manage their declaration of interests via the UKRI DoI Portal.

**UKRI employees** should submit and manage their declaration of interests via the UKRI DoI Portal.

**Innovate UK monitoring service providers** should declare interests via MO Communities (MOC).

**All other non UKRI employees (including advisory group members)** should submit their declaration of interests using the manual form.

- 3.4 Where an individual's role and responsibilities require them to complete a declaration, but no relevant interests exist, a declaration must still be submitted confirming there are no interests to declare (we refer to this as a "nil return").
- 3.5 Declarations must be assessed (as detailed in Roles and responsibilities table above) to determine whether any conflict exists and whether any action is required to mitigate risk exposure. All decisions must be recorded. The individual assessing the disclosure is accountable for ensuring that any conflicts of interest identified are mitigated and for sending any manual forms to the appropriate team that is responsible for record keeping. Where a 'nil return' declaration is submitted, responsible managers should note the response but are not required to complete an assessment.
- 3.6 If the individual assessing the disclosure determines that an actual, potential, or perceived conflict of interest exists, they will work together with the individual to implement an agreed course of action to manage the conflict.
- 3.7 If during the assessment, any conflicts are identified, mitigating actions must be reviewed regularly (at least annually) to ensure they remain appropriate and proportionate. They must be reviewed by both the individual making the declaration and the assessor, escalating to DDRA where required. More frequent reviews may be requested as necessary, in particular where impacted events occur such as renewal of contracts. Copies of all registers will be retained permanently as per the UKRI Retention Schedule.
- 3.8 When a declaration is considered to identify a high-risk conflict of interest, UKRI will carry out further investigations to determine the exact nature of the relationship and its impact on UKRI's operations and reputation. Such investigations might include:
- discussions with the individual concerned
  - requests for further information on the nature of the relationship
  - review of UKRI's financial and business relationship with the third party
  - records updated by an amendment to the declaration and mitigating actions
- 3.9 The declaration of interest process is managed by the DDRA who is responsible for maintaining a central combined UKRI register of interests. Each council or UKRI Central Services Directorate will ensure all declarations in their designated areas are reviewed and assessed annually (prior to the end of the financial year)



## UK Research and Innovation

and recorded on the DoI Portal. They will notify the DDRA at [conflictsofinterest@ukri.org](mailto:conflictsofinterest@ukri.org) when this exercise is complete.

- 3.10 UKRI will publish (make available on the UKRI web site) declarations of interests of all board members and Executive Committee members. Councils will also publish (make available on the UKRI website) declarations of interests of all council members and their senior leadership team, as a minimum. Councils may publish additional registers of interests where this is required for transparency purposes.
- 3.11 The Internal Controls team will complete quarterly assurance checks of a random sample of declaration records to ensure compliance with the UKRI Policy. A report on the findings will be provided to the DDRA.
- 3.12 Each council and the UKRI Central Services Directorates should monitor their registers throughout the year, not just for the purpose of the above exercise.

### 4. **Examples of the types of interests which should be declared.**

- 4.1 Outlined below are examples of a range of situations where there could be (or could be perceived to be) a conflict of interest relevant to an individual's role and responsibilities with UKRI:
- 4.2 **Financial interests** – an individual may receive a direct financial benefit from the consequences of the awarding of funding, for example:
  - a director, including a non-executive director, or senior employee in an organisation which is, or which is likely, in receipt of funding or possibly seeking to obtain funding
  - a shareholder (or someone with similar ownership interests), a partner or owner of a private or not-for-profit company which is, or is likely to seek, or obtain funding
  - a shareholder or UKRI related start up
  - a management consultant for a business/individual
  - a person in receipt of secondary income from a business/individual
  - a person in receipt of any payments (for example honoraria, one-off payments, day allowances or travel and subsistence) from an organisation possibly seeking to obtain funding
- 4.3 **Indirect financial interests** – an individual may have a close association with an individual who has a financial interest in a commissioning decision (as those categories are described above) for example:
  - spouse / partner
  - close relative (for example, parent, grandparent, child, grandchild, sibling)
  - close friend
  - business partner
  - a financial relationship (for example, pension) with a business / individual



# UK Research and Innovation

seeking to obtain funding

- 4.4 **Non-financial professional interest** - an individual may obtain a non-financial professional benefit from the consequences of a funding award, such as increasing their professional reputation or status, or promoting their professional career. This may, for example, include situations where the individual is:
- an advocate for a particular group
  - a member of a particular specialist professional body
- 4.5 **Non-financial personal interests** – an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit. This could include, for example, where the individual is:
- a voluntary sector champion for business / individual
  - a volunteer for business / individual
  - a member of a lobby or pressure group with an interest in research or development
- 4.6 **Indirect interests** – an individual may have a close association with an individual who has a non-financial professional interest, or a non-financial personal interest in a commissioning decision (as those categories are described above) for example, a:
- spouse / partner
  - close relative (for example, parent, grandparent, child, grandchild, sibling)
  - close friend
  - business partner

## 5. Mitigations

- 5.1 A mitigation action plan might include a range of actions. Some examples of mitigating actions are provided below:
- deciding that no action is necessary
  - withdrawal from discussion of a particular item of business at a meeting
  - restricting an individual's involvement in discussions and excluding them from decision making
  - removing an individual from the whole decision-making process
  - removing an individual's responsibility for an entire area of work
  - removing an individual from their role altogether if the conflict is so significant that they are unable to operate effectively in the role
  - exclusion from any financial or commercial involvement
  - limiting or restricting access to relevant papers or document management systems folders
  - limiting any involvement or exposure to any decision-making or consideration of contract procurement and / or external resourcing





- exclusion from any financial or commercial involvement
- keeping log of correspondence or contact

## 6. Board, council, committee, programme / project boards and advisory groups

- 6.1 The UKRI declaration of interests policy requires our senior leaders and those involved in decision making to declare any interests that could be (or be perceived as) a conflict in any discussions, decisions or actions that could risk the impression that UKRI has acted improperly.

### **Declaration and register of interests**

- 6.2 For those implementing new boards, committees or groups the first step in managing conflicts of interest is to establish a register of interests, this is normally managed by the Secretariat and Chair.
- 6.3 Each member should submit their declaration of interests to the Chair via the DoI Portal. If a declaration has already been made for other purposes, this can be updated to include the Chair as a secondary assessor. Those without access to the DoI Portal should submit their declaration using the manual form.
- 6.4 The Secretariat can request a downloaded copy of the full register from the DoI Portal by contacting their local governance team. For UKRI groups you should contact the Internal Controls team at [conflictsofinterest@ukri.org](mailto:conflictsofinterest@ukri.org).
- 6.5 The chair should assess the declared interests to identify any potential, perceived or actual conflicts. Where conflicts are identified, appropriate mitigating actions should be agreed and recorded as part of the signed assessment. Mitigations should be put in place and recorded on the local register.
- 6.6 The register of interests should be regularly reviewed and updated at least annually, or when an individual requires an amendment to be made to their details.

### **Identifying and managing conflicts**

- 6.7 Best practice is that all declared interests should be assessed on a case-by-case basis and in the context of an individual's role, responsibility and sphere of influence within the board / committee / advisory group and the wider organisation and community.
- 6.8 Some key mitigations we would expect to see in place for these groups are included below for reference, but it is important to note that this list is not exhaustive. It is not possible to predict all and every scenario where a conflict may exist and bespoke mitigations may be required in certain scenarios which is why it is important that declarations are assessed regularly, and on a case-by-case basis.
- 6.9 **Meeting papers** - prior to the circulation of meeting papers and sharing of information with members, the local register of interests should be checked to ensure there are no actual or perceived conflicts which would mean the information should not be shared with any member(s). Where the decision is made not to share papers or information this should be formally recorded. Written information should state that it is not to be shared.



## UK Research and Innovation

- 6.10 **Meeting agenda** - at the outset of each meeting, the chair should ask the members if they would like to declare a conflict of interest. The board member should state which agenda item the conflict relates to and excuse themselves for that portion of the meeting. This should be recorded in the minutes.
- 6.11 **During the meeting** - if it becomes apparent during the meeting that a conflict will arise, the board member should immediately inform the chair and excuse themselves for that portion of the meeting. This should be recorded in the minutes.
- 6.12 **Terms of reference** - the process for managing conflicts of interests should be formally documented in the terms of reference.

### 7. Support available

- 7.1 Training materials are provided internally on the [Declarations of Interest Source Page](#). If you do not have access to UKRI systems, you can request training materials by contacting [conflictsofinterest@ukri.org](mailto:conflictsofinterest@ukri.org).
- 7.2 Guidance for using the DoI Portal is provided on the [DoI Portal landing page](#).
- 7.3 Each council has a nominated contact for declarations of interest. You should reach out to your local contact in the first instance. The list of key DoI contacts is available on the [DoI Portal landing page](#). If you do not have access to UKRI systems, you should reach out to your usual UKRI contact in the first instance.
- 7.4 If your nominated contact is not able to assist you, they may pass you on to the Internal Controls team at [conflictsofinterest@ukri.org](mailto:conflictsofinterest@ukri.org).
- 7.5 To escalate high-risk conflicts to the DDRA please use [internalcontrols@ukri.org](mailto:internalcontrols@ukri.org).