

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

The online Declaration of Interests exercise was first introduced for all staff in November 2012 to capture the many interests at play within the LSE community. Prior to this an annual paper-based exercise had captured only the interests of senior managers, governors and budget holders.

All staff are required to complete the Declarations of Interest form. It is essential that the School is able to appropriately manage any possible conflicts that arise.

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

A Conflict of Interest arises where you owe separate duties to act in the best interests of the School 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 School 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, School business, research or other decisions in ways that could lead to gain for them, their family or others to the detriment of the School's integrity and its missions of teaching, research and public service.

No one should be involved in making decisions on School 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 a wide range of School activities, such as student admissions, student assessment, disciplinary proceedings, appeals, staff recruitment, staff promotion and remuneration, procurement, and assessing proposed relationships between the School and outside parties.

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 extracurricular commitments that may create conflict, please note that you should ensure that this is in line with the Terms and Conditions of your employment. Should you have any queries, please contact your line manager.

Conflicts can be managed much more readily if the School is made aware of them. If you are asked to participate in making a decision on School 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. Trustees would be in conflict if they stood to benefit financially or otherwise from the School.
4. A member of an interview panel is a relative or close friend of one of the applicants and fails to disclose the relationship.
5. A member of staff involved in procurement of services selects the business of a family member to provide services to the School.
6. Where outside interests or commitments conflict with the role or commitments to the School.
7. The use of the School's facilities to pursue external business or consulting activities.
8. A member of staff also serves on the Board of a funding body that is considering an application from the School.
9. A researcher has an interest in an organisation for which they are conducting research.
10. Involvement of a close friend, relative or partner in a research contract.

**I've already completed a form – why am I being asked to do it again?**

This is an annual exercise providing a snapshot of individual interests at a particular point in time. To be meaningful it is important that the information is kept up to date and is seen to be kept up to date.

**Can you just send me last year's entry so that I can update it?**

In the long term we hope to have a system that will allow staff to update their record each year. Although this is not currently possible, you can request a report of your entry once you have completed the form. Please send your request to [ethics@lse.ac.uk](mailto:ethics@lse.ac.uk)

**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 and governors 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 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 School 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 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 during the year as the need arises by notifying the Ethics Manager by email at: [ethics@lse.ac.uk](mailto:ethics@lse.ac.uk)

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

The survey is administered by School staff using the Qualtrics online survey design tool. Qualtrics is IMT's 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. Survey responses are stored in a secure, password controlled section of a networked drive. Access to the data is limited, only personnel in the Governance, Legal and Policy Division have access to the primary data set. The School complies with the Data Protection Act. 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 School's legal, regulatory and ethical framework. For example, a list of companies will be provided to Procurement. 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 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 School's Records Manager would carefully examine the circumstances of the case against the 'fairness' test, following which it would be reviewed by the Director of the Governance, Legal and Policy Division. If you require further information, please contact the Records and Information Management Team, Tel: 020 7955 6481, Email: [glpd.Info.Rights@lse.ac.uk](mailto:glpd.Info.Rights@lse.ac.uk).

The interests of members of the Council as both company directors and charity trustees are, as they have always been, open to public scrutiny.

**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 Stephanie Allison, Ethics Manager by email [ethics@lse.ac.uk](mailto:ethics@lse.ac.uk) or on 020 7955 7975.