



# **Standards of Business Conduct**

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# **1 Introduction**

These guidelines are intended by Queen Mary University of London (QMUL) to be helpful to all QMUL employees to explain the guiding principles relating to the conduct of business by QMUL.

## **2 Responsibility of QMUL**

QMUL is responsible for ensuring that these guidelines are brought to the attention of all employees and that processes and procedures are put in place for ensuring that they are effectively implemented.

## **3 Responsibility of the Secretary to the Council**

The Secretary to the Council is responsible for providing advice (including obtaining legal advice if necessary) and assistance to staff and Heads of Schools/Institutes in complying with QMUL's code of business conduct.

## **4 Responsibility of Heads of Schools/Institutes**

Heads of Schools/Institutes are responsible for ensuring that staff in their Schools/Institutes comply with QMUL's code of business conduct.

Heads of Schools/Institutes are responsible to the President and Principal for matters relating to their own compliance with QMUL's code of business conduct.

## **5 Guiding principle in conduct of public business**

It is a long established principle that public sector bodies, which include QMUL, must be impartial and honest in the conduct of their business, and that employees should remain beyond suspicion. The Seven Principles identified by the Committee on Standards in Public Life are included under Appendix F.

It is an offence under the Bribery Act 2010 for an employee to accept any inducement or reward for doing, or refraining from doing anything, in his or her official capacity, or showing favour, or disfavour, in the handling of contracts (see Appendix B). It is also an offence under Money Laundering, Terrorist Funding and Transfer of Funding Regulations 2017 to derive a pecuniary benefit, directly or indirectly in the exchange of criminally obtained money or other assets for 'clean' money or other assets. There are specific policies on Anti Bribery and Anti Money Laundering.

Staff will need to be aware that a breach of the provisions of these Acts renders them liable to prosecution.

## **6 Principles of conduct**

Staff are expected to:

- Ensure that the interests of students and/or patients remains paramount at all times
- Ensure that research work is carried out to the highest achievable standards of integrity and accepted best research practice
- Be impartial and honest in the conduct of their official business
- Use the public funds entrusted to them to the best advantage of QMUL, always ensuring value for money

It is also the responsibility of staff to ensure that they do not:

- Abuse their official position for personal gain or to benefit their family or friends
- Seek advantage or further private business or other interests, in the course of their official duties

## **7 Conflicts of interest**

Notwithstanding the principles of conduct which staff, students and all involved with QMUL in whatever way are expected to follow, there may be situations whereby a conflict of interest may occur.

A working definition of a conflict of interest is: 'A conflict between the private interests and the official responsibilities of a person in a position of trust'.

The definition is not restricted to those circumstances where an individual actually betrays that trust. It can be just as damaging for the conflict to appear to exist.

The term 'conflicts of interests' as used in this document includes conflicts of duty, rights, obligations, interests and similar conflicts, whether as an individual or as a representative of QMUL. Examples of situations in which this might apply are shown in Appendix D.

## **8 Implementing the guiding principles:**

### **8.1 Casual gifts**

Casual gifts offered by suppliers or others, e.g. at Christmas, should if possible be politely but firmly declined. Articles of low intrinsic value such as diaries or calendars need not necessarily be refused (to a level set by the Finance and Investment Committee, which is currently £25).

In cases of doubt staff should either consult their Head of School/Institute or politely decline acceptance.

If staff receive gifts of value greater than the level currently set then they should inform their Head of School/Institute and record the details in the on-line gifts and hospitality register in accordance with the procedure in Appendix D.

## 8.2 Business Hospitality

Modest business hospitality of external visitors, provided it is normal and reasonable in the circumstances, e.g. lunches in the course of working visits, is acceptable.

Where hospitality is received from another organisation, and exceeds that usually expected in the course of a working visit (e.g. light refreshment or working lunch), staff should declare such hospitality or entertainment. An entry should be made in the gifts and hospitality register in accordance with the procedure in Appendix E. If in doubt they should seek the advice of their Head of School/Institute.

## 8.3 Declaration of interests

QMUL needs to be aware of all cases where an employee, or his or her close relative or associate, has a controlling and/or significant beneficial interest in a business (including a private company, public sector organisation, other employer and/or voluntary organisation), or in any other activity or pursuit, which may compete for a contract to supply either goods or services to QMUL.

For the purpose of this policy, a significant financial interest includes the following items received or held by the employee:

- Shares, share options, warrants and other securities and interests in a company (together referred to as 'shares')
- Payments for services e.g. consulting fees, directors fees, stipends or honoraria or payments in kind (together referred to as 'consultancy fees')
- Payments in respect of intellectual property, including licence fees, royalties and revenue sharing arrangements, except those made under QMUL's Intellectual Property policies

Certain minimum thresholds apply as follows:

- Where a financial interest consists of shares, it will be treated as excluded from the definition of significant financial interest where **all** the following conditions are met:
  - The shares are held in a listed company
  - The current value of the shares does not exceed £5,000 at any time
  - It can reasonably be demonstrated that there is no relationship or connection, explicit or implicit, between the acquisition of the shares and any research to be undertaken for the company
- Where a financial interest consists of consultancy fees, it will be treated as excluded from the definition if **both** the following conditions are met:
  - The consultancy fee is less than £5,000 in any twelve month period
  - It can be reasonably demonstrated that payment of any fee is not related to or contingent on the award of the proposed relationship between QMUL and the company (e.g. a research contract or sponsored studentship)

All QMUL staff should therefore declare any interests to QMUL, either on starting employment or on acquisition of the interest, in order that it may be known to, and in

no way promoted to the detriment of QMUL, staff, patients or students. See Appendix C about how to declare an interest.

QMUL will ensure that:

- Staff are aware of their responsibility to declare relevant interests
- Registers of all such interests are maintained
- the policy, after consultation with staff, is in place. The policy includes consideration of disciplinary action to be taken if an employee fails to declare a relevant interest, or is found to have abused his or her official position or knowledge, for the purpose of selfbenefit, or that of family or friends

## **8.4 Preferential treatment in private transactions**

Individual staff must not seek or accept preferential rates or benefits in kind for private transactions carried out with companies, with which they have had, or may have, official dealings on behalf of QMUL (this does not apply to concessionary agreements negotiated with companies, or by recognised staff interests, on behalf of all staff e.g. staff benefits schemes).

## **8.5 Contracts**

All staff who are in contact with suppliers and contractors (including external consultants), and in particular those who are authorised to approve Purchase Orders, or place contracts for goods and services, are expected to adhere to professional standards as set out in the Code of Ethics of the Chartered Institute of Purchasing and Supply (CIPS), reproduced at Appendix A.

## **8.6 Favouritism in awarding contracts**

Fair and open competition between prospective contractors or suppliers for QMUL contracts is a requirement of the Financial Regulations and of EC Directives on Public Purchasing for Works and Supplies. This means that:

- No private or voluntary organisation or company which may bid for QMUL business should be given the advantage over its competitors, such as advance notice of QMUL requirements. This applies to all potential contractors, whether or not there is a relationship between them and QMUL, such as a long running series of previous contracts
- Each new contract should be awarded solely on merit, taking into account the requirements of QMUL and the ability of the contractors to fulfil them

QMUL will ensure that no special favour is shown to current or former employees or their close relatives or associates in awarding contracts to private or other businesses run by them or employing them in a senior or relevant managerial capacity. Contracts may be awarded to such businesses where they are won in fair competition against other tenders, but scrupulous care must be taken to ensure that the selection process is conducted impartially, and that staff that are known to have a relevant interest have no part in the selection process.

## **8.7 Warning to potential contractors**

QMUL will ensure that all invitations to potential contractors to tender for QMUL business include a notice warning tenderers of the consequences of engaging in any corrupt practices involving employees of public bodies.

## **8.8 Outside activities**

Opportunities exist for academic staff to be engaged in a range of activities external to QMUL. Many of these kinds of external activities, whether paid or unpaid, have the potential to contribute to the overall health, vitality and profile of QMUL and are encouraged by QMUL.

QMUL draws a distinction between situations where an individual undertakes external activities and where a School/Institute is asked to participate in external activities.

This section of the code of business conduct applies only to the time in which the Member of Staff is acting in some way on behalf of QMUL or on activities that arise from their role or position within QMUL, whether in a full time, part time or honorary basis. Any other activities which a Member of Staff might wish to undertake are not covered by the code of business conduct.

This section of the code of business conduct does not seek to replace existing terms and conditions of service, for example the procedures governing fees for Consultant grade medical staff.

Some external activities are an extension of QMUL's academic role. Examples of this include peer review of articles and grant applications, acting as an external examiner or assessor for another University, serving on editorial boards, serving on international, national or professional committees, lecturing and broadcasting, advice to sponsors of research work.

Other external activities are more in the line of private consultancy work where a member of the academic staff is engaged on work in a personal capacity for an external organisation, typically an industrial or commercial firm, or in the case of the School of Medicine and Dentistry a private hospital or clinic, for private patients or for a medical or research charity or organisation. Examples might include; providing expert advice, acting as an expert witness, undertaking specialist studies, lecturing, report writing, non NHS clinical work, consultancies for the WHO or British Council or being a Director, Partner or shareholder in a commercial enterprise.

QMUL has long recognised external activities as being not just of personal benefit but of benefit to QMUL. However, there are measures that need to be put in place to ensure that the time and resources spent on external activities does not conflict with, or otherwise impact on the discharge of QMUL related duties to student, patients, research or administration nor conflict with, or otherwise damage, any other QMUL interests.

QMUL recognises that there is a difference between a member of staff's personal private time, and the time which is expected by QMUL to be used in the interests of students, patients, research or other QMUL activities.

Permission from the President and Principal may be given to Heads of Schools/Institutes to undertake outside activities. Heads of Schools/Institutes will similarly give approval to their staff to undertake outside activities. In both cases this is subject to the following conditions (this does not apply to occasional and limited

work which may occur from time to time as described above, subject to a de minimis level of £5,000 per financial year):

- The President and Principal/Head of School/Institute being satisfied that such work will not interfere with the individual's specified QMUL duties of teaching, research and administration (and, where relevant clinical duties)
- The President and Principal/Head of School/Institute being satisfied that such work will not conflict with, or damage, QMUL interests
- Consultancies, directorships and partnerships should not normally occupy more than a set number of working days within a specified period per year as agreed with the President and Principal/Head of School/Institute
- Where the Head of School/Institute withholds permission, then the member of staff may appeal to the President and Principal

Consultancy work undertaken in conjunction with QMUL is excluded from the above as being already agreed with the President and Principal/Head of School/Institute concerned.

Academic staff undertaking outside work must:

- Confirm in writing, where appropriate, that they have personal insurance cover against professional negligence (in the case of private clinical practice, they must maintain full cover by a medical defence organisation)
- Make clear in all communications with external organisations that they are acting in a personal capacity and not as an employee of QMUL
- Make appropriate payment to QMUL for the use of QMUL resources including but not limited to: QMUL administrative services, equipment, consumables and accommodation
- Make a full declaration, if requested, to the President and Principal/Head of School/Institute of the time spent on outside work in time that would ordinarily be devoted to students, patients, research or furthering the interests of QMUL during the academic year

QMUL recognises that Members of Staff who undertake outside activities may wish to retain some or all of their fees. Request should be made within 30 days of receipt of the monies, QMUL will disburse to the individual via payroll net of appropriate tax.

Fees may however be surrendered to QMUL to support academic or research activities and if surrendered will be subject to QMUL's financial regulations and procedures.

## **9 Appendix A: From the Chartered Institute of Purchasing and Supply – Code of Ethics**

### **9.1 Introduction**

The code of ethics is as follows:

### **9.2 Code of Ethics**



### **Ethical practice**

- conduct all business relationships with respect, honesty and integrity, and avoid causing harm to others as a result of business decisions
- treat all stakeholders fairly and impartially, without discrimination or favour
- actively support and promote corporate social responsibility (CSR)
- avoid any business practices which might bring QMUL into disrepute.

### **Professionalism**

- use procurement strategies to drive unethical practices from the supply chain
- ensure procurement decisions minimise any negative impact on human rights and the environment whilst endeavouring to maximise value and service levels
- put ethical policies and procedures in place, regularly monitored and updated, and ensure compliance
- mandate the education and training of all staff involved in sourcing, supplier selection and supplier management to professional standards
- practise due diligence in all business undertakings.

### **Accountability**

- accept accountability and take ownership of business ethics
- foster a culture of leadership by example
- take steps to prevent, report and remedy unethical practices
- provide a safe environment for the reporting of unethical practices.

## **9.3 Guidance**

In applying these precepts, staff should follow the guidance set out below:

- Declare any personal interest that might affect, or be seen by others to affect, a member's impartiality in any matter relevant to their duties and to any decision making
- Ensure that information given in the course of employment is accurate
- Respect the confidentiality of information received. Never use such information for personal gain
- Strive for genuine, fair and transparent competition
- Not to accept inducements or gifts, other than items of small value, such as business diaries or calendars
- Declare the offer or acceptance of hospitality and never allow hospitality to influence a business decision
- Remain impartial in all business dealings and not be influenced by those with vested interests

Code of Professional Ethics: <https://www.cips.org/cips-for-business/supply-assurance/corporate-ethical-procurement-and-supply/corporate-code-of-ethics/>

## **10 Appendix B: Bribery Act 2010 – Summary of Main Provisions**

The Bribery Act 2010 came into force on 1 July 2011, and applies to all individuals working at all levels and grades for QMUL, including consultants, agency staff,

volunteers, interns, agents, sponsors, or any other person associated with QMUL wherever situated, and applies to both home and overseas.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage which is illegal, unethical, a breach of trust or the improper performance of a contract. Corruption is the misuse of entrusted power for personal gain.

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and induce them to act dishonestly. Inducements can take the form of gifts, fees, rewards, jobs, internships, examination grades, favours or other advantages.

It is an offence under the Bribery Act 2010 to:

- Promise or offer a bribe, or to give an advantage
- Request, agree to receive or accept a bribe, or accept an advantage
- Bribe a foreign public official
- In addition it is a corporate offence to consent to or connive in the commission of a bribery offence by anyone associated with QMUL in respect of business carried out on behalf of QMUL.

QMUL has a zero tolerance policy towards bribery and corruption and is committed to the highest level of openness, integrity and accountability, both in letter and spirit. The penalties for these offences are severe and can mean up to 10 years imprisonment for the individuals responsible. In addition, if QMUL is found to have connived in or consented to acts of corruption undertaken in its name, the penalties include personal liability for senior managers and an unlimited fine, together with significant reputational damage for QMUL and could result in other Governmental-related consequences, such as debarment from public (government) tendering.

QMUL Anti Bribery and Corruption Policy can be found on the Policy Zone

<http://www.arcs.qmul.ac.uk/policy/index.html>

## **11 Appendix C: Conflicts of Interest Policy**

### **11.1 Introduction**

Any member of staff with a real or implied interest is responsible for making a declaration of the interest prior to any decision being made, which they might be in a position to influence.

## **11.2 Application**

The conflict of interest policy applies to all QMUL funds and to all activities of QMUL.

## **11.3 Real or implied interest**

An interest real or implied may arise in a number of ways, for example, a professional or personal interest in a supplier who is bidding for a contract.

An implied interest concerns matters, which are not clear cut, for example, where a member of staff has worked previously for a potential supplier and thus might possibly have information or to be in a position to influence unfairly a decision to award an order or contract.

QMUL staffs have a responsibility for informing their Head of School/Institute of any real or implied interest.

## **11.4 Declaration**

The Head of School/Institute should consider the matters declared to him/her by the member of staff and determine whether the matter reported represented a real or implied interest.

If in the view of the Head of School/Institute, there is a real conflict of interest then the matter must be disclosed using QMUL's standard declaration of interest form as attached.

If the conflict affects a Head of School/Institute, then he/she should report the matter to the President and Principal who will then decide whether there is a conflict of interests.

The declaration form must be submitted to the to QMUL Registrar

The Registrar to QMUL will keep a register of all conflicts of interest declared.

## **11.5 Avoiding a conflict of interest**

Members of QMUL staff who declare an interest must take appropriate action to ensure that the conflict of interest is avoided as far as possible (e.g. by resigning from a tender selection/assessment panel).

If it is not possible for a conflict of interest to be avoided (e.g. in the case of the purchase of a specialised item of equipment where the number of suppliers is limited), then the member of staff must not place him/herself in the position of sole responsibility for decision making.

## **11.6 Disciplinary action**

QMUL's financial regulations allow for disciplinary action to be taken against QMUL Staff that knowingly fail to declare a conflict of interest.

### Conflict of Interest Declaration

*Please complete this form, hand to your Head of School/Institute who will pass it to the Secretary of QMUL*

Name: \_\_\_\_\_ School/Institute: \_\_\_\_\_

Title: \_\_\_\_\_ Extension Number: \_\_\_\_\_

Matter in which there is a conflict of interest:

Signed: \_\_\_\_\_ Dated: \_\_\_\_\_

Passed to Head of Department/Division on: \_\_\_\_\_

Passed to the Secretary of QMUL on: \_\_\_\_\_

Form received by the Secretary to QMUL's Office on: \_\_\_\_\_

Entered in Register on: _____
Action taken to remove conflict of interest:          
Signed: _____ Dated: _____

## **12 Appendix D: Gifts and Hospitality Policy**

### **12.1 Introduction**

Any member of staff who is offered a gift should normally try and refuse it unless it is of a value of less than that set by the Finance and Investment Committee from time to time.

Any member of staff who is offered hospitality in excess of what would normally be expected to be provided by QMUL should normally try and refuse it.

Where gifts and hospitality cannot be avoided then the member of staff should be aware of QMUL's procedures on accepting them and declaring gifts and hospitality.

### **12.2 Application**

The gifts and hospitality policy applies to all QMUL Council members, staff and individuals representing QMUL in any way.

### **12.3 Gifts**

Staff should be aware that it is QMUL policy not to accept gifts wherever possible. However, minor items of a value less than the level set by the Finance and Investment Committee from time to time (currently £25) can be accepted. Gifts accepted of a value above this level should be declared to the Head of School/Institute and recorded in the gifts and hospitality register which can be found on QMUL intranet here:

<https://webapps2.is.qmul.ac.uk/gifts/edit-gift.action?id=0&type=gift>

The Head of School/Institute is responsible for ensuring that staff complete the Gifts and Hospitality register expediently. The information from the register will be passed on to the Director of Finance.

### **12.4 Hospitality**

In normal circumstances it is accepted that staff would travel to other institutions and be provided with reasonable hospitality. This might include light refreshments, a working lunch or evening meal.

When travelling, staff may be reimbursed for the cost of an evening meal on production of a receipt in accordance with QMUL travel and expenses policies.

It is not however, acceptable that QMUL staffs are put in a position to be influenced into making a decision on behalf of QMUL as a result of excessive hospitality.

In order to avoid having been seen to be influenced QMUL staff should be open about the hospitality that they receive, be it from a Supplier, another Institution, a Learned Society or another public sector body.

Openness involves the disclosure of invitations to attend functions, dinners or other events where the cost would exceed that normally expected to be provided by QMUL.

Members of staff should ensure that their Head of School/Institute is aware of their being invited to such functions. The Head of School/Institute should consider whether the invitation would represent an undue influence and should be formally recorded in QMUL's gifts and hospitality register which can be found on QMUL intranet here

<https://webapps2.is.qmul.ac.uk/gifts/edit-gift.action?id=0&type=gift>

If in the view of the Head of School/Institute, the hospitality on offer would represent an undue influence then he/she should ensure that the Registrar to QMUL is informed of the donor of the hospitality, the date and venue and who attended. This should be actioned through the completion of the Gifts and Hospitality register by the member of staff concerned. The information from the register will be passed on to the Director of Finance.

## **12.5 Honorariums and funding of travel arrangements**

Under certain circumstances the granting of honorariums and/or the sponsorship of travel arrangements by suppliers, especially pharmaceutical or research orientated companies can be seen as an inducement to influence future decision making.

QMUL procedures require that all such honorariums and sponsorships should be disclosed fully to the Head of School/Institute and recorded in the Register of Gifts and Hospitality which can be found on QMUL intranet here

<https://webapps2.is.qmul.ac.uk/gifts/edit-gift.action?id=0&type=gift>

## **12.6 Access to the Register**

It is QMUL policy that the Register of Conflicts of Interest, and Register of Gifts and Hospitality are open for inspection by members of Council, Senior Management and staff of QMUL.

## **13 Appendix E: Situations where a conflict of interest might arise**

### **13.1 Conflict of educational mission**

QMUL employees who are involved in educating, training, supervising or directing the work of students (“Education”), should ensure that the education they provide is appropriate to the Student.

QMUL has a primary objective to educate and train students. Special care must be taken to ensure that the choice of a student’s research project and the direction of research is not, and does not appear to be influenced by, their supervisor’s financial interests.

Whilst the following refer to research students, many of the same points are also applicable to junior members of academic staff and research assistants.

#### **Conflicts and their management**

As a general rule QMUL should not seek to enrol a student where:

- The student receives support from (i.e. is sponsored by) a company in which the proposed academic supervisor has a significant financial interest
- Where the results arising from, or IP generated in the course of the research project are related to the research activities of a company in which the supervisor has a significant financial interest

QMUL believes that such situations are very difficult to monitor and that both the supervisor and QMUL are vulnerable to allegations that the student’s research (and advice given on other issues) was directed in a way that was not in the student’s best interests.

One approach to the management of this conflict situation is to identify an alternative member of academic staff, with no significant financial interest, to act as the student’s supervisor.

However, it is also to the student’s advantage to be supervised by the member of staff with the greatest expertise and in a very few circumstances this may require that a student is supervised by a staff member with a significant financial interest in the sponsoring organisation. In these circumstances permission should be sought from the Head of School/Institute and the interest reported to the Secretary of QMUL.

Increasingly students themselves start businesses whilst still at university. No member of staff, who is in a position to judge the quality of that student’s work, or to evaluate the student in any way, should take any financial stake or hold a formal position in such a student run, owned or controlled venture whilst the student is enrolled at QMUL.

## 13.2 Conflict of research integrity

QMUL employees should maintain the highest standards of scientific integrity in the conduct of research.

The complete, objective and timely dissemination of new findings through publications is essential for research integrity. In this context, publication means any means of dissemination of research findings, including publication in a journal, information placed on the web, conference presentations or any other kind of scientific communication.

The potential for personal gain must not jeopardise nor appear to jeopardise the integrity of research activities, including the choice of research, its design, the interpretation of results, or the reporting of such results.

### Conflicts and their management

Conflicts of interest can arise in a number of situations, for example:

- The researcher has a significant interest in the company sponsoring the research, this being exacerbated if the value of the researcher's financial interest may be affected by the outcome of the research
- The researcher is an inventor of patents whose value might be affected by the outcome of the research
- The researcher holds a position in an enterprise that may wish to restrict or otherwise manage adverse research findings for commercial reasons

The preservation of research integrity must be largely dependant on self regulation through the promotion of a climate of high ethical standards. However, where a researcher has, or appears to have a conflict of interest (because for example he/she has a significant financial interest in a research sponsor), integrity in designing, conducting and reporting the research may be insufficient to protect the researcher and QMUL from suspicion and consequent reputational damage. In such cases researchers should take special measures to put themselves beyond suspicion.

Where any member of staff has a conflict of interest they should:

- before the research project is accepted, inform their Head of School/Institute about the conflict, who may declare the interest to the Secretary of QMUL
- play no part whatsoever in the negotiation of the financial terms of the research contract
- at the time of submission of a publication to a journal, comply with any conflict of interest policy of the relevant journal
- make a similar form of disclosure on all other forms of publication

Conflicts of this kind should be managed or avoided in a number of ways:

- By declining the opportunity to undertake the research
- By arranging to have the work carried out by an independent investigator



- By appointing a co-investigator who has control over the design and analysis of the research and its results

In the case of clinical research, researchers should also comply with the appropriate Ethics Committee.

### **13.3 Conflicts of financial interests**

QMUL employees have a responsibility to respect and promote the financial interests of QMUL. Staff and all associated with QMUL should:

- Receive appropriate financial benefits from the provision of research, including consultancy and other services conducted through QMUL
- Receive appropriate benefits from the commercialisation of its intellectual property
- Receive appropriate financial benefits from the use of other resources and assets, including equipment, technical staff, facilities
- Make responsible use of its financial resources in accordance with the financial regulations

#### **Conflicts and their management**

A QMUL employee's relationship with another organisation may create financial responsibilities to that organisation, which conflict with his or her financial responsibilities to QMUL.

Such potential conflicts can be managed in a number of ways, including:

- Seeking formal permission from the Head of School/Institute, which would involve describing the nature of the relationship, and if necessary, it being reported to the Secretary of QMUL in accordance with the Conflicts of Interest Policy (Appendix C)
- Contracts with external organisations, including their financial terms, being negotiated by the appropriate department, with the employee playing no part whatsoever in such negotiations
- Disclosing all inventions or other IP generated by an individual as part of (for example) a private consultancy
- Where QMUL employees provide consultancy services, providing them through QMUL
- Where any goods or services are to be purchased from a business in which an employee has any significant financial interest, then such interests should be declared to the Director of Resources

### **13.4 Conflicts of commitment/Loyalty**

QMUL employees and individuals associated with QMUL owe a primary commitment to QMUL. Membership of Committees, Boards, Advisory Groups (e.g. External Appointments) infers an obligation (and sometimes a statutory duty) to act in the best interests of the external body. These duties may overlap with the duties and obligations as employees or representatives of QMUL.

#### **Conflicts and their management**

- Staff should seek HR advice before the acceptance of external appointments and the conduct of non academic work, including limits on the amount of time committed.
- The scheduling of commitments to such external bodies should be such that they do not result in significant rescheduling of lectures, tutorials or other supervisory or management duties

In all circumstances the employee must disclose in writing and discuss any potential conflicts with their Head of School/Institute:

- Prior to the commencement of such a commitment
- When circumstances change in such a way that result in changes to that conflict (either as a result of changes to the employee's responsibilities at QMUL, changes in the relationship between the external company and QMUL, or changes in the level of commitment to the external body). This can present a significant challenge since circumstances often change gradually and with little formality. It is nevertheless important, for the staff member's own protection, that the Head of School/Institute is informed, in advance, of any changes to the relationship

## **14 Appendix F: Seven Principles identified by the Committee on Standards in Public Life (formerly known as the Nolan Committee)**

### **1. Selflessness**

Holders of public office should act solely in terms of the public interest.

They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

### **2. Integrity**

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

### **3. Objectivity**

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

### **4. Accountability**

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

### **5. Openness**

Holders of public office should be as open as possible about all the decisions and actions that they take.

They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

### **6. Honesty**

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

### **7. Leadership**

Holders of public office should promote and support these principles by leadership and example.