

DECLARATION OF INTERESTS POLICY

1. INTRODUCTION AND OVERVIEW

- 1.1. In keeping with its academic mission and purposes, Imperial College London (“Imperial” or the “University”) encourages University Members to engage in a variety of external activities (“Interests”). In encouraging such interaction, the University is mindful of its obligation to provide safeguards, wherever possible, against anything arising from these Interests which could be detrimental to the University or to individual members of staff.
- 1.2. This Declaration of Interests Policy (“Policy”) applies to any University Member, while acting for or on behalf of Imperial in an official capacity, and outlines the Declaration of Interests process (including the Annual Declaration of Interests). It also explains what the University views as a Conflict of Interest.
- 1.3. If a University Member has a Conflict of Interest (actual, perceived or potential), they have a duty to disclose it and to take such actions as may be appropriate. If in doubt, disclose the Interest by following the process set out in section 5 of this Policy.
- 1.4. The University is committed to maintaining the highest standards of integrity, honesty, and professionalism in all its activities. University Members should conduct themselves with impartiality and avoid situations that could give rise to actual, potential, or perceived Conflicts of Interest, or that could reasonably create suspicion of impropriety. This Policy exists to support University Members in identifying, disclosing, and appropriately managing such conflicts, while enabling legitimate external activities and professional engagement.

2. PURPOSE

- 2.1. Within the [Core Terms and Conditions of Service](#), the University permits, subject to prior approval and annual declarations thereafter, University Members to undertake paid and unpaid activities for external organisations, to hold or receive equity or licensing income or to carry out casual work within the University which is outside of their contracted hours with the University.
- 2.2. Such activities may include liaison with industry, professional bodies, commerce, charities and Government departments, including via personal directorships, partnerships, consultancies (including private clinical practice), trusteeships, trade engagements, membership of official committees and intellectual property licensing and involvement in spin-out companies (as per the University’s [Intellectual Property Policy](#)). Although such activities comprise personal rather than institutional relationships, in order to be confident of securing the required prior approval for the outside Interest University Members are expected to align such activities and Interests with the requirements of Imperial’s [Relationships Policy](#) and [Research Code of Practice](#); for example, Interests with partners in the sensitive countries cited in the Relationships Policy will require particular scrutiny. University Members should also be aware that some

individual activities or Interests could require personal registration under the Government's [Foreign Influence Registration Scheme \(FIRS\)](#).

- 2.3. A confidential Register of Interests is maintained of the Interests of all University Members, both full and part time, and paid and unpaid, which may or may not overlap with the Interests and business of the University.

3. SCOPE

- 3.1. The term **University** refers to Imperial College London as well as any subsidiary majority-owned by Imperial College London.

- 3.2. The term **University Member** (as defined in the [University's Ordinances](#)) will be taken to mean any of the following:

- a) Members of the Council;
- b) Members of Council Committees;
- c) Members of University Advisory Boards;
- d) The Fellows;
- e) Persons awarded the Imperial College Medal or granted the status of Fellow of the University;
- f) Persons granted an Honorary Degree;
- g) Staff; and
- h) Students.

- 3.3. A **Conflict of Interest** arises when a University Member's personal, financial, or other external Interests could reasonably be seen to influence, or appear to influence, their judgement, decisions, or actions in the course of University duties. Conflicts include **actual, potential, and perceived situations**. The University provides guidance and examples of situations that may give rise to a Conflict of Interest in the [Conflict of Interests Guidance](#).

- 3.4. An **Interest** is a financial or non-financial Interest held by the University Member. A financial Interest including but not limited to pay, commission, consultancy, equity Interest, forgiveness of debt, property, licensing income, and honoraria. A non-financial Interest may include external roles or affiliations, or relationships relevant to University activities, access to Imperial resources.

- 3.5. A **Connected Person** is an individual whose relationship with the University Member could reasonably be seen to give rise to a Conflict of Interest. This typically includes, but is not limited to, the University Member's spouse or partner, close family members, and others living in the same household, as well as any person with whom the University Member has a close financial or personal relationship.

4. POLICY

- 4.1. University Members are required to declare relevant Interests to ensure that actual, potential, or perceived Conflicts of Interest are appropriately managed. There are three key mechanisms:

- 4.1.1. **Immediate declaration:** Interests that could give rise to a conflict should be **declared as they arise**, so they can be assessed and managed in a timely manner.
- 4.1.2. **Exempt activities – no declaration required:** Certain activities are considered low risk and **do not need to be declared**, provided they have no connection with University business and cannot create a conflict. Examples include personal memberships, minor shareholdings in unrelated companies, and unrelated voluntary activities.
- 4.1.3. **Exempt but reportable activities:** Some low-risk activities are **exempt from requiring permission**, but **must be declared annually** in the University's Annual Declaration of Interests process. Examples include external academic examining, editorial roles, and casual work outside contracted hours.

5. PROCESS

- 5.1. Before undertaking or accepting, or renewing or extending an Interest, prior permission must be obtained through submitting a request to the Head of Department via the University's online declaration platform, and approval then being given, that Interest must then be annually declared thereafter (the Annual Declaration of Interest process).
- 5.2. The review of a request for approval will take into consideration how the Interest might impact on the delivery and relativity of that University Member's University duties and how it would serve the University Interests as well as the Interests of the University Member, prior to any approval being granted.
- 5.3. Where a University Member seeks approval for external work of a commercial nature (including Directorships or Partnerships) that is not routed through the University office, they must provide either: (a) a signed waiver for private work from the external organisation confirming the University Member is acting in a personal capacity and not on behalf of Imperial (a pro-forma waiver is available on the website [here](#)); or (b) written confirmation that they have made this distinction clear to the external organisation. Approval may be withheld if this assurance is not provided. This requirement does not apply to work routed through ICON or to low-risk Interests such as trusteeships, external committee membership, or casual work unrelated to University duties. This waiver ensures that the University's approval of private work does not imply institutional endorsement or liability. Work routed through ICON is subject to separate contractual arrangements and does not require a waiver.
- 5.4. Heads of Departments should submit their own requests to their Faculty Dean/line manager **but cannot delegate their approval responsibilities to others**.
- 5.5. For the avoidance of doubt, prior written permission must be obtained before undertaking external consultancy work through the University's company ICON and any Interests through Imperial subsidiaries (except those excluded in section 5.13).
- 5.6. New staff joining the University must disclose and seek approval from their Head of Department for any Interests they already hold by submitting them as new Interests when they join Imperial. If approved, they must thereafter annually declare their Interests as part of the Annual Declaration of Interest process via the University's online declaration platform.

- 5.7. It should be noted that once an Interest has been approved, the approval will last for a period of five years. At this point it must be submitted for re-approval.
- 5.8. The University prefers external consultancy work to be routed through ICON, to enable any contractual risks and liabilities to be managed.
- 5.9. Failure to comply with section 5.3 of this Policy may result in reputational risk to the University, particularly where the external organisation assumes or implies an institutional association. Such misrepresentation could expose the University to third-party claims or litigation, with potential financial and reputational consequences. For the avoidance of doubt, the University's approval of such private work does not constitute endorsement, nor does it create any liability or indemnity on the part of the University. University Members undertaking private work are expected to seek independent legal advice and ensure they have appropriate insurance cover in place.
- 5.10. In exceptional cases, for example, where the University Member is the sole director or controlling party of the external organisation, the waiver must be countersigned by the University Member's Head of Department or Faculty Dean to confirm that the distinction between personal and institutional capacity has been clearly established.
- 5.11. The use of University facilities as part of a University Member's Interest with an external organisation requires prior Head of Department/line manager approval and an appropriate arrangement to be entered into with the University to manage liabilities and to provide for (as an example) cost reimbursement.
- 5.12. Where such Interest is approved, details will be held as part of the University's confidential Register of Interests.
- 5.13. **Exclusions**

University Members do not require permission to undertake the exempt activities listed below under the University's Declaration of Interests Policy nor do they need to declare these as part of the Annual Declaration of Interest process provided the activity has no connection with Imperial business or duties:

- a) Academic activities, including but not limited to:
 - i. Awarded grants;
 - ii. Research contracts (such as MTAs or CASE studentships) that have been entered into by the University with an external organisation;
 - iii. Involvement in research programmes or clinical trials (e.g. as a Chief- Investigator, Co-Principal Investigator, or researcher), unless the University Member believes such work falls within section 2.3 of the University's [Conflict of Interests Guidance](#);
 - iv. Attending a scientific congress or conference;
 - v. Authorship of scholarly works such as books, articles, papers and columns. University Members are required to familiarise themselves with the Copyright section of the Intellectual Property Policy;

- vi. Giving lectures, talks, interviews and speaking to the media;
- vii. External examiner of a PhD viva;
- viii. Revenue received via University's Reward to Inventors Scheme;
- ix. Intellectual Property Right applications filed by Imperial Innovations;

University Members who receive reduced travel or conference costs/fees that are consistent with the [University's Expenses Policy](#) do not need to declare these as Interests, provided such reductions do not create any actual, potential, or perceived Conflict of Interest.

- b) Membership (including unpaid board membership) of a residents' association or of a property management company operating where the activity relates to personal residence. Personal / private low risk matters unrelated to work are exempt i.e. personal property or social memberships.
- c) Shareholding of less than 5%, unless such shareholding is in a company which may engage in business with the University and the University Member has a significant influence in that company;
- d) Membership (including being an unpaid board member or trustee) of non- scientific societies (e.g. sporting or leisure societies), charities, and voluntary organisations provided that such work is unpaid, does not fall within the Conflict of Interest definition at section 1.5 of the University's [Conflict of Interests Guidance](#) and that the work has no link to what is being carried out by the University.

Information relating to (a)(vii) and (a)(viii) above is held centrally in the University and summaries can be provided to Heads of Departments to coincide with People's Annual Declaration process. Heads of Departments/line managers may request further information to fully consider an approval request for an Interest.

University Members do not require permission to undertake the exempt activities listed below but they must declare these as part of the Annual Declaration of Interest process:

- e) Undertaking academic activities on behalf of external organisations (rather than in a University capacity), including but not limited to:
 - i. Examining taught degree programmes for other Universities;
 - ii. Teaching at other Universities;
 - iii. External assessment (e.g. promotion panels or competition judging) for other Universities;
- f) Editor of a journal (including membership on an editorial board);
- g) Casual work within Imperial College (outside of contracted hours) e.g. bar or retail work.

However, should any exclusion described in this section 5.13. later give rise to a Conflict of Interest as described in the Policy, that Interest must be disclosed in accordance with the Policy and managed as described in the [Conflict of Interests Guidance](#).

Where a University Member whose Interest(s) actually, potentially, or might be perceived to impact upon the objectivity of any academic presentation or publication in which the University Member is involved, they must ensure that the presentation or publication is accompanied by a public declaration of the relevant Interest.

6. RETENTION OF INCOME FROM EXTERNAL INTERESTS

Senior officers of the University – the President, the Provost, their direct reports and members of the University Management Board – are also required to disclose any personal remuneration that will be received from external Interests. Retention of the income will be part of the approval process for new Interests where this is proportionate, in line with the Declaration of Interests Policy and practice applied to all staff. Members of Council, Council Committees, and designated University Officers are subject to enhanced declaration requirements, in accordance with Council Regulation 2.

7. EXTERNAL FUNDING

University Members must refer to and comply with all relevant external research funding bodies' policies pertaining to conflicts of Interests and external Interests. Should there be a conflict between this policy and the policies of external research funding bodies, the external policy obligations do not negate those contained here. However, to the extent that the policies of external research funding bodies contain additional requirements, beyond what is required by this Policy, those additional requirements shall be complied with in full. Further information can be found on the [Declaration of Interests web-site](#).

8. COMPLIANCE AND ACCESS

- 8.1. The Register of Interests is noted on the University's online declaration platform and, once a decision has been recorded, a copy kept on the individual's personal file in accordance with the Data Protection Act (2018). Deans of Faculties and the Business School, the Chief People Officer, and the Registrar and University Secretary will be responsible for ensuring and maintaining compliance, along with instructing University Members in their areas to make an annual declaration of Interests in order to confirm and update records. This will involve, for example, sampling annual declarations and requiring Heads of Departments to follow up incomplete or inaccurate declarations with University Members.
- 8.2. Access to the Register of Interests is restricted to those who require it to fulfil their University responsibilities. The Chair of the University Council, the President, the Provost, the Registrar and University Secretary, Deans of Faculties and Business School, Faculty Chief Operating Officers, the Chief People Officer, the Chief Legal Officer & Deputy University Secretary, the Research and Enterprise Operating Officer, the Co-Directors of Enterprise, and the Director of the Research Office reserve the right to access the information and may make specific further delegations in writing. The Auditors reserve the right to access the information and Heads of Departments/Divisions have the right of access to the section of the Register of Interests dealing with University Members in

their own Faculty/Department/Division. Other requests for access require authorisation by the Chief People Officer and information held on an individual may not be disclosed to any third party, other than those identified above, without the written permission of that individual. Under the provisions of the Data Protection Act (2018) individuals have the right to a copy of the data held on them by the University by application to the University Data Protection Officer.

9. FAILURE TO DISCLOSE

Failure to seek approval for and/or disclose complete and accurate information on Interests for inclusion on the Register of Interests may constitute misconduct and result in disciplinary action being taken by the University.

10. LINKED POLICIES

The University has a number of related Ordinances, Regulations, policies and procedures already in place, which should be considered in conjunction with this Policy. These include:

- The [University's Ordinance](#) 3.1.2 relating *inter alia* to the declaration of Council, Court and Council Committee members' Interest in any matter under discussion at these committee meetings;
- The [Regulations of Council](#) 2 and 6.24 relating *inter alia* to financial ethics, declaration of member's interests and Conflicts of Interest;
- The University's [Purchasing Regulation PR7](#) relating to the Declaration of Interests;
- The [Gifts and Hospitality Policy](#) which sets out the standards of behaviour the University expects from its employees, members of the Court and Council and members of University Advisory Boards when they are offered gifts and hospitality by external organisations or have personal, financial or other beneficial Interests in any transaction between the University and a third party;
- The University's Guidance on Personal/Familial Relationships;
- The University's Post Award Management (of Externally Funded Research) Policy relating *inter alia* to Conflict of Interests under which University Members are required to declare any conflicts of Interest relating to active research awards; and
- The University's [Relationships Policy](#).

The University treats equality of opportunity seriously and has an equality framework that is applicable to staff in order to promote and ensure equality of opportunity. Implementation of this procedure must be clear and transparent and not subject to any unfair discriminatory practices.

| POLICY AND DOCUMENT CONTROL | |
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| Policy title: | Declaration of Interests Policy |
| Date approved: | 28 November 2025 |
| Approving body: | Council |
| Last review date(s): | November 2025 |
| Revision history: | Version 1: November 2025 |
| Next review date: | November 2027 (or following any significant legal or regulatory change) |
| Related internal policies, procedures, guidance: | <ul style="list-style-type: none"> • Code of Conduct for Staff • Declaration of Interests Policy and Conflict of Interests Guidance • Gifts and Hospitality Policy • Ordinance 3 • Procurement Regulations and Policy • Regulation of Council 6: (Financial Matters) • Regulation of Council 9: Public Interest Disclosure (Whistleblowing) Policy • Relationships Policy |
| Division / Department / Function: | Division of the University Secretary on behalf of Council |
| Policy owner: | Registrar & University Secretary |
| Point of contact(s): | Division of the University Secretary (university.secretary@imperial.ac.uk) |