

Policy Title: Conflicts of Interest Policy

Decision: Screen Out

Contact: Office of the University Secretary

Date of Completion: 5 January 2026

Part 1: Policy Scoping

Information about the policy

Name of the Policy

Conflicts of Interest Policy

Is this an existing, revised, or new policy?

New

What is it trying to achieve? (For example, intended aims and outcomes)

The purpose of this policy is to:

- (i) enable employees and external lay members of Council/Council Committees, to recognise where their personal interests' conflict with, or may reasonably be perceived to conflict with, their University duties (see Section 3 and Appendix 2);
- (ii) communicate the expectations for declaring and recording actual and perceived conflicts of interest (see Section 4);
- (iii) set out the process and procedure for managing conflicts of interest (see Appendix 1 Conflicts of Interest Procedure and flow chart); and
- (iv) protect the University, and those individuals covered by the policy, against impropriety, or the appearance of impropriety, including reputational risk.

Are there any Section 75 categories which might be expected to benefit from the policy? If so, explain how below.

Note: The Section 75 categories are:

- religious belief
- political opinion
- racial group
- age
- marital status
- sexual orientation
- sex
- disability
- dependants

Who initiated or wrote the policy?

The University Secretary initiated and the Governance and Policy Manager wrote the policy.

Who owns and implements the policy?

The Chief People Officer owns the policy and the University Secretary implements the policy.

Implementation factors

Are there any factors which could contribute to or weaken the intended aim or outcome of the policy?

No

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

- Employees
- Other:
 - External lay members of Council and Council Committees (including co-opted appointees)
 - Anyone affiliated to the University through honorary contracts (for example, visiting academics, visiting researchers and honorary academics).
 - All third parties retained by the University to perform services for, and on behalf of, the University.

Other policies with a bearing on this policy

What are they and who owns them?

Policy: Financial Regulations

Policy owner: Chief Strategy and Finance Officer

Policy: Procurement Policy

Policy owner: Chief Strategy and Finance Officer

Policy: Gifts, Gratuities and Hospitality Policy

Policy owner: Chief People Officer

Recruitment and Selection Policy

Policy owner: Chief People Officer

Policy: Fraud and Theft Response Plan

Policy owner: Chief Strategy and Finance Officer

Policy: Anti-Bribery Act Guidance
Policy owner: Chief People Officer

Policy: Raising Concerns (Whistleblowing) Policy
Policy owner: Chief People Officer

Policy: Code of Practice for Professional Integrity in the Conduct of Research
Policy owner: PVC Research

Policy: Staff Disciplinary Procedures
Policy Owner: Chief People Officer

Policy: Intellectual Property Policy and Procedures
Policy Owner: PVC Research

Policy: Consultancy Policy and Procedures
Policy Owner: PVC Research

Available evidence

What evidence or information (both qualitative and quantitative) have you gathered to inform this policy? Please specify details for each of the Section 75 categories below.

Religious Belief

The University's EO data were reviewed. On 6th February 2024, our staff profile was 51.99% Catholic and 48.01% Protestant. Compared with 6th February 2019, this indicates a 2.93% increase in Catholic staff.

Political Opinion

The University does not collect information on Political Opinion or make assumptions regarding Political Opinion based on Community Background.

Racial Group

The University's EO data were reviewed. On 6th February 2024, our staff profile was 92.78% White and 7.22% Black and Minority Ethnic (BME). This indicates a 1.82% increase in BME staff compared with 2019.

In AY 2023/24, 9.91% of students identified as BME. This indicates a 4.93% increase in BME students compares with AY 2018/19.

Age

The University's EO data were reviewed. On 6th February 2024, 31.08% of our staff were in the 46-55 age band and 25.84% of staff were in the 36-45 age band. 26.23% of staff were aged '56 and above', which represents a 3.77% increase compared to 2019 (22.46%).

Marital Status

The University's EO data were reviewed. In February 2024, 56.00% of staff were 'Married or in a Civil Partnership', a decrease of 6% compared to 2019 (62%).

Sexual Orientation

The University's EO data were reviewed. In 2024, 74.30% of staff were 'Heterosexual'; 4.32% were 'LGBT+' and 21.38% were 'Not Known'.

Men and Women generally

The University's EO data were reviewed. In 2024, 57.95% of staff were 'Female'. This indicates a 1.96% increase in female staff compared with 2019.

Disability

The University's EO data were reviewed. In 2024, 5.98% of staff declared a disability, an increase of 1.15% compared with 2019.

Our disability declaration rate is lower than expected, compared with the local population. The NI Census (2011) found that 20.6% of the NI population stated that their day-to-day activities were limited because of a long-standing health problem or disability.

Dependants

The University's EO data were reviewed. In 2024, 43.82% of staff had dependants. This indicates a decrease of 3.89% compared with 2019.

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy or decision? (Please specify for each of the Section 75 categories below the needs, experiences and priorities)

Religious Belief

None identified.

Political Opinion

None identified.

Racial Group

None identified.

Age

None identified.

Marital Status

None identified.

Sexual Orientation

None identified.

Men and Women generally

None identified.

Disability

None identified.

Dependants

None identified.

Consultation

Consultation with relevant groups, organisations or individuals about the policy can provide useful information about issues or opportunities which are specifically related to them (that is evidence to inform the policy).

The following groups have been consulted to gather information for this policy:

- Policy Clinic Staff
- Trade Unions
- Procurement Team
- Teaching and Assessment Staff
- Research and Innovation Staff
- Consultancy Policy Staff
- Director of People and Culture – Partnerships and Services

Part 2: Screening questions

Introduction

The answers to the following screening questions will assist the University in making a decision whether or not there is a need to carry out an equality impact assessment on the policy. The following information is provided to help you to identify and comment on the level of likely impact of the policy in question 1 to 4.

Select 'major' impact if:

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there are insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;
- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

Select 'minor' impact if:

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunities for particular groups of disadvantaged people;

- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations;
- e) Differential impact observed and opportunities exist to better promote equality of opportunity and/or good relations.

Select 'none' if:

- a) The policy has no relevance to equality of opportunity or good relations;
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations.

Taking into account the evidence presented in Part 1, please complete the screening questions (Question 1 to 4).

Screening questions

1. What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 categories?

Details of the likely policy impacts on **Religious Belief**

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

What is the level of impact?

None

Details of the likely policy impacts on **Political Opinion**

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

Level of impact

None

Details of the likely policy impacts on **Racial Group**

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

Level of impact

None

Details of the likely policy impacts on **Age**

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

Level of impact

None

Details of the likely policy impacts on **Marital Status**

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

Level of impact

None

Details of the likely policy impacts on Sexual Orientation

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

Level of impact

None

Details of the likely policy impacts on Men and Women generally

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

Level of impact

None

Details of the likely policy impacts on Disability

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

Level of impact

None

Details of the likely policy impacts on Dependants

The policy is unlikely to impact on equality of opportunity for this category. The policy is technical in nature.

Level of impact

None

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories?

Religious Belief

No, the policy is technical in nature.

Political Opinion

No, the policy is technical in nature.

Racial Group

No, the policy is technical in nature.

Age

No, the policy is technical in nature.

Marital Status

No, the policy is technical in nature.

Sexual Orientation

No, the policy is technical in nature.

Men and Women generally

No, the policy is technical in nature.

Disability

No, the policy is technical in nature.

Dependants

No, the policy is technical in nature.

3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?

Religious Belief

Details of the likely policy impacts on **Religious Belief**

The policy is unlikely to impact on good relations between people of different religious belief. The policy bears no relation to good relations.

Level of impact

None

Political Opinion

Details of the likely policy impacts on **Political Opinion**

The policy is unlikely to impact on good relations between people of different religious belief. The policy bears no relation to good relations.

Level of impact

None

Racial Group

Details of the likely policy impacts on **Racial Group**

The policy is unlikely to impact on good relations between people of different religious belief. The policy bears no relation to good relations.

Level of impact

None

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Religious Belief

No, the policy bears no relation to good relations.

Political Opinion

No, the policy bears no relation to good relations.

Racial Group

No, the policy bears no relation to good relations.

Additional considerations**Multiple identity**

5. Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy or decision on people with multiple identities? (For example, disabled minority ethnic

people; disabled women; young Protestant men, and young lesbians, gay and bisexual people).

No. The policy is technical in nature and has no relevance to equality of opportunity or good relations.

Please specify the relevant Section 75 categories concerned below.
Provide details of the policy impact and data which describes the policy impact.

Not applicable.

Disability Duties

6. Does the policy provide an opportunity to encourage disabled people to participate in University life?

No. The policy is technical in nature.

7. Does the policy provide an opportunity to promote attitudes towards disabled people?

No. The policy is technical in nature.

Part 3: Screening decision

Based on the evidence considered and outlined in Part 1 and the responses to the screening questions (Part 2), please indicate the screening decision for this policy.

Note: The University should take particular care not to screen out policies that have a procurement aspect if there is potential to promote equality of opportunity through the procurement of services.

- Screen in** the policy (that is, subject to an Equality Impact Assessment). The likely impact is **major** in respect of one, or more of the equality of opportunity or good relations categories.
- Screen out** the policy without mitigation or an alternative policy proposed to be adopted (that is, **no** Equality Impact Assessment). The likely impact is **none** in respect of all of equality of opportunity or good relations categories.
- Screen out** the policy and **mitigate the impacts on equality by amending or changing the policy**, or by **developing an alternative policy or action** (that is, **no** Equality Impact Assessment). The likely impact is **minor** in respect of one or more of the equality of opportunity or good relations categories.

If the decision is to subject the policy to an equality impact assessment (that is, 'screen in' the policy), please provide details of the reasons.

Not applicable

If the decision is not to conduct an equality impact assessment (that is, 'screen out' the policy), please provide details for the reasons.

The likely impact is 'none' in respect of all the equality of opportunity and/or good relations categories. The policy is technical in nature and has no relevance to equality of opportunity or good relations.

This policy is designed to: assist in identifying conflicts of interest; establish a system to support the disclosure of conflicts of interest; provide guidance to those responsible for dealing with conflicts of interest; and assist in the resolution of conflicts of interest to protect both the parties involved in the disclosure, together with the wider University.

In line with University policy, the policy will be reviewed two years after it has been implemented and, if necessary, amended.

If the decision is not to conduct an equality impact assessment (that is, 'screen out' the policy), and mitigate the impacts on equality of opportunity by amending or changing the policy, or by developing an alternative policy or action, please provide reasons to support your decision, together with the proposed changes, amendments or alternative policy.

Not applicable.

Timetabling and prioritising

If the policy had been '**screened in**' for an equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1 to 3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority rating for timetabling the equality impact assessment in terms of effect on equality of opportunity and good relations:

Not applicable.

Priority rating for timetabling the equality impact assessment in terms of social need

Not applicable.

Priority rating for timetabling the equality impact assessment in terms of effect on people's daily lives

Not applicable.

Priority rating for timetabling the equality impact assessment in terms of relevance to the University's functions

Not applicable.

Note: The Total Rating Score will be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the University in timetabling. Details of the University's Equality Impact Assessment Timetable will be included in its quarterly Screening Reports.

Is the policy affected by timetables established by other relevant public authorities?

No

Approval and authorisation



Screened by:

Position or Job Title: Clare Jamison

Date screened: 15 December 2025



Approved by:

Position or Job Title: Chief People Officer

Date approved: 05 January 2026

Review

This policy is due for review (in terms of its impact on equality of opportunity and good relations) by the policy owner on: 5 January 2028