



STAFF CODE OF CONDUCT AND DECLARATION AND REGISTER OF INTERESTS

1. This Code of Conduct sets out principles which should govern the conduct of members of staff and procedures for the registration and declaration of interests.
2. In establishing the Code, the University draws particular attention to the need to conform to the "Seven Principles of Public Life" adopted by the Nolan Committee, namely: selflessness; integrity; objectivity; accountability; openness; honesty; and leadership.
3. The following principles should guide the conduct of all members of staff:
 - members of staff must act at all times with integrity;
 - in dealing with public funds, staff must set and abide by the highest standards of propriety;
4. Individual members of staff should at all times act with awareness of their wider responsibilities. They must:
 - comply with this Code;
 - act in good faith and in the best interests of the University of Sussex;
 - act in full accordance with the normal principles of financial accountability.
5. Members of staff must not:
 - act in a way which will bring the University of Sussex into disrepute;
 - use information gained in the course of their employment for personal gain;
 - use their employment to promote or assist in any of their other activities.
6. As a general guide, members of staff should not take any action which cannot be publicly explained. The overriding principle which should be applied is that staff must declare any matter which may give rise to a conflict of interest or of trust in fulfilling their role as an employee.

Register of Interests

7. It is a normal expectation in public life that those having responsibility for decisions, particularly those which have financial considerations and effects, should ensure that they distance themselves from any possibility of a conflict of interest between any of their personal activities and matters with which they are involved as members of a public body. To facilitate good practice and to reinforce the University's commitment to propriety at all times, it has been agreed that a Register of Interests should be maintained and updated on an annual basis (and amended during the year as relevant changes of notifiable interests arise). The Register will record financial and other relevant interests

of key employees and will be available for inspection by members of the University and other bona fide enquirers.

8. As a guide, members of staff should ask themselves whether members of the public, knowing the facts of the situation, would reasonably conclude that the interest involved might influence the approach taken to University business. If so, the interest would be deemed to be sufficient for an entry to be made in the Register of Interests. The Register asks members of staff to record interests arising in the following areas of activity:
 - all directorships registered under the Companies Act, whether or not they are remunerated;
 - employment, office or profession or other activity apart from employment by the University of Sussex;
 - other interests, for example: clients or business relationships which they know to have a direct connection with the University and its associated companies or which might affect their business; any significant shareholdings in organisations which they know to have business with the University or its associated companies; unremunerated posts, honorary positions and other connections which may give rise to a conflict of interest or of trust.
9. Members of staff are also asked to record relevant interests, where they are both known and material, held by members of their immediate family, that is to say, spouse, partner, parents, children and siblings.
10. It is not intended or expected that personal, political or religious affiliations should be declared.
11. The formal Register of Interests lists information relating to the University's Council members, senior staff (i.e. ULT members), staff with significant financial authority and staff with access to privileged information.

Declaration of Interest

12. Any member of staff who has a clear and substantial interest in a matter with which they are involved during the course of their work must declare that interest to their Section Head and must also declare that interest at any meeting where the matter is to be discussed, whether or not that interest has already been declared and recorded in the Register of Interests. Declarations must make clear the nature of the interest and whether it carries either direct or indirect financial interests to the individual member. Such declarations will be recorded in the minutes of any relevant meeting.
13. Where such an interest constitutes a direct or indirect financial interest, the member involved should not seek to influence any decision relating to the matter concerned.
14. Members of staff who hold office with or are employees of other bodies which receive funds from the University of Sussex or its associated companies may participate in general discussions and decisions regarding such bodies but should not seek to influence any decision which relates principally to the particular body with which they are associated.

15. Where a member of staff has an interest which is not financial, but which is relevant to the business of the University, that interest must be declared. Where the interest is substantial, the member involved should not seek to influence any decision on the matter in question and should withdraw from the discussions and decisions relating to that interest. Where an interest arises from membership of a public body and where there is no financial interest, full participation in the discussion and decision is allowable. (A public body is deemed as any institution or organisation wholly or significantly supported through public funds, a professional organisation or a representative group.)
16. Members of staff must not participate in committees or other groups acting on behalf of the University or its associated companies where there is a clear possibility that a conflict of interest will regularly arise.

Acceptance of Gifts and Hospitality

17. Members of staff should always refuse offers of gifts or hospitality which they judge to be excessive. In general, meals may be accepted provided that they are working or other recognised proper occasions and the apparent costs of the hospitality are reasonable. Attendance at social events where the invitation is clearly made because of a connection with the University of Sussex is acceptable provided the hospitality is not excessive. A record should be made in your Unit's hospitality register when the cost of hospitality is believed to be worth £100 or more.
18. During tender periods, no hospitality should be accepted from companies which may be involved in tendering.
19. Please refer to the University's Anti-Bribery Policy for further information regarding the acceptance of Hospitality and Gifts

Compliance with the Code

20. If members of staff have difficulty in complying with this Code or are in doubt concerning a particular matter arising from it, they should contact the Governance Office who will provide appropriate advice.

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