



dit students' union

Register of Interests Policy

DIT Students' Union

Contents

Chapter	Page
1.0 Policy statement	3
2.0 Introduction, Definitions and Scope of Policy	3
3.0 Personal Benefit	4
4.0 Register of Interests	4
5.0 Implementation and Monitoring of the Conflict of Interest Policy	5
 Appendices	
Appendix 1 Declaration of Interest Form	6 & 7
Appendix A Declaration of Business Interests	8 & 9

1.0 Policy Statement

- 1.1 As a recipient of public funding and an important member of the Institutes community and the wider community, Dublin Institute of Technology (DIT) Students' Union is expected to maintain the highest standards in all of its actions.
- 1.2 DIT Students' Union has strong values and highly ethical. The Union is therefore committed to upholding and promoting the highest standards of behaviour and to preventing, identifying and acting upon corruption, fraud and irregularity.
- 1.3 DIT Students' Union's future, and its ability to deliver its mission statement, rests in large part on maintaining a good reputation with its stakeholders.
- 1.4 DIT Students' Union is based on a strong mission statement; the Union is therefore committed to upholding and promoting the highest standards of behaviour and to preventing, identifying and acting upon corruption, fraud and irregularity.
- 1.5 Elected officers, Directors, staff and volunteers are expected to act with the highest standards of integrity and probity in all dealings to do with DIT Students' Union. The Directors and managers in particular are expected to lead by example in ensuring that the highest levels of behaviour are adopted.
- 1.6 The establishment of a register of interests is part of DIT Students' Union's good governance practice.

2.0 Introduction, Definitions and Scope of Policy

- 2.1 The purpose of this policy is to detail how conflicts of interest / disclosures are controlled. The policy explains what is meant by the term conflict of interest, details measures that should be taken to prevent such conflicts occurring and outlines how any potential conflict of interest should be managed.
- 2.2 The Conflict of Interest Policy is part of DIT Students' Union's efforts to ensure financial probity, promote the highest standards of behaviour and control the risk of fraud, corruption and irregularity. The policy operates alongside, and is supported by, the Union's Financial Procedures.
- 2.3 A conflict of interest is defined as:
 - 2.3.1 *"Any financial or other personal interest that an individual may have in any relationship or proposed relationship between DIT Students' Union and an external body, or between individuals within DIT Students' Union."*
- 2.4 Relationships between members of staff or between members of staff and elected officers could lead to a conflict of interest. For example, a personal relationship between a Director and a Manager could lead to a suspicion of favouritism or preferential treatment when making decisions on promotion, pay-rises, access to training, etc. Such relationships should be declared in the same way as relationships with external suppliers or similar. Declarations of such relationships will need to be handled in a more sensitive manner and issues of confidentiality will need to be considered more carefully.
- 2.5 It is up to each individual to decide whether a conflict of interest could exist and, if so, to declare the conflict. When deciding on such matters, consideration must be

given to how things could appear to others and, in all cases, individuals should err on the side of caution, declaring an interest if there is any possibility that a conflict of interest may exist.

- 2.6 The Deputy CEO will deal with personal benefit and register of interest disclosures and will be available to offer advice and information to staff and elected officers about this policy.

3.0 Personal Benefit

- 3.1 Elected officers, Directors and members of staff must not use their office or employment for personal gain and should act at all times in good faith and in the interests of DIT Students' Union.
- 3.2 Officers and members of staff who are responsible for purchasing goods or services for DIT Students' Union may not purchase or procure the same type of goods or services for personal benefit at a preferential cost by virtue of their employment or elected office.
- 3.3 Elected officers, Directors and members of staff may not accept gifts or favours, except when not to do so would damage the relationship with an external party. Any such gifts or favours should be declared to the CEO or the Deputy CEO.
- 3.4 Any excessive offers of gifts, favours, bribes, etc. should be reported immediately to the Chief Executive Officer in order to ensure that no suggestion of impropriety could be made in the future and in order for the CEO to decide whether any further action should be taken against the external party.
- 3.5 Staff and elected officers who received gifts over €20 and totalling €100 in any academic year, must declare same to the Deputy CEO.

4.0 Register of Interests

- 4.1 Declaration of any possible conflict of interest provides a protection for DIT Students' Union and individuals against any allegations of impropriety.
- 4.2 The Deputy Chief Executive Officer (Deputy CEO) will maintain a register of interests, containing all declarations made by individuals. Any declaration made by the Deputy CEO should be discussed with the Chief Executive. Any declaration made by the CEO should be discussed with the Chairperson of the Board of Directors.
- 4.3 Declarations should be made using the standard form shown at Appendix 1. Declarations should be made providing as much detail as possible. As a minimum, all declarations should record:
- 4.3.1 The name of the individual making the declaration
- 4.3.2 The date that the declaration was made
- 4.3.3 The signatures of the Deputy CEO (or CEO in the case of declarations by the Deputy CEO).
- 4.3.4 The nature of the conflict of interest in as much detail as possible

- 4.3.5 Details of the external body or other individual concerned in the conflict
 - 4.3.6 Details of any financial or other benefits received by the individual making the declaration
 - 4.3.7 Details of any preventative measures that will be taken to mitigate the conflict of interest
 - 4.3.8 Details of any other parties who need to be informed of the conflict, for example, Board of Directors, the individual's line manager, etc.
- 4.4 The Deputy CEO in will ensure that this policy is brought to the attention of Officer, staff and volunteers on a regular basis and that individuals are encouraged to declare conflicts of interest.

5.0 Implementation and Monitoring of the Conflict of Interest Policy

- 5.1 A declaration of interest does not replace the need for individuals to declare relevant interests during the course of the business of a committee or during day-to-day activity.
- 5.2 The Board of DITSU Ltd will monitor the implementation of this policy and is responsible for advising the CEO of any further measures required to control the risk of fraud, corruption and irregularity.
- 5.3 Breach of this policy may lead to disciplinary action against members of staff or other appropriate action against officers/Directors.

Appendix 1 – Declaration of Interest Form

Complete this form in as much detail as possible, referring to the Conflict of Interest Policy for guidance. You may also wish to consult with the Chief Executive Officer for further advice and assistance.

The information will be recorded and may be passed onto other parties within DIT Students' Union as follows:

"The Students' Union is committed to providing a confidential service to all its users. Nothing you tell us will be shared with any other department, organisation or individual outside the Service without your express permission, unless:

- 1. Required by law (under the Prevention of Terrorism and Child Protection Acts)
- 2. A conflict of interest arises
- 3. It is necessary in order to ensure student and staff safety
- 4. Where it is believed that maintaining confidentiality would result in serious harm to a third party "

Please type or handwrite this form; use additional sheets of paper if necessary

The following Declaration of Interests provides written notification, in accordance with DIT Students' Union Conflict of Interest Policy, of my interest or relationship that may lead to or be perceived as giving rise to, a conflict of interest between myself and the interests of DIT Students' Union. In signing this Declaration, I acknowledge that this Declaration will be filed in a central Conflicts of Interest Register. I further acknowledge that in disclosing my interests and signing this form that I agree to comply with the strategies implemented by DIT Students' Union in the management of these interests, as details on this form below.

Your Name:

Your Email Address:

Elected Officer/Director/Staff
(please circle)

Your Department:

Nature of the conflict of interest:

.....

.....

.....

Details of any financial or other benefits received by yourself, a family member, close friend of business associate:

.....

.....

.....

External body or other individual concerned in the conflict:

.....

.....

Details of how the conflict of interest will be managed (to be completed by the CEO):

.....
.....
.....
.....
.....

Your signature:

Date:

CEO signature:

Date:

REGISTER OF BUSINESS INTERESTS

All Directors of DITSU Ltd must advise DIT Students' Union of any Business Interest of which they are aware, as soon as they arise on the Business Interest Declaration Form at Appendix A. The Register of Business Interests will be kept as a separate document to the Conflict of Interest Register. It is important that any business interests are identified before a conflict arises and Board members should use this opportunity to identify any separate business interests they have. The CEO will then consider its impact on DIT Students' Union and whether any conflicts are liable to arise.

The Register will be brought to the Board of DITSU Ltd on an annual basis for note of any additions made and review of existing entries, but any new business interest should be notified as soon as they are created.

The register will be maintained by the Deputy CEO following approval by the Board.

Recommendation:

1. The Board of DITSU Ltd note the current Register and notify any declaration of Business Interest to the Company Secretary of DITSU Ltd
2. The Board of DITSU Ltd continue to notify the CEO of any declaration of conflicts of interests as they arise.

