

THE GLASGOW SCHOOL OF ART

Register of Interests Policy and Procedure

POLICY DETAILS:

Date approved	18 June 2024
Approving Bodies	Board of Governors
Implementation Date	18 June 2024
Supersedes	September 2020
Date of Impact Assessment	June 2024
Review Date	June 2027
Author	Corporate Governance Office
Supporting Policy	<ul style="list-style-type: none">• Anti-Bribery and Corruption Policy• Gifts, Hospitality, Material Benefits or Services Policy for the Board of Governors
Benchmarking	Code of Good HE Governance (2023) University of Glasgow University of Aberdeen University of Edinburgh University of Strathclyde Heriot-Watt University University of Stirling University of Dundee University of St Andrews

THE GLASGOW SCHOL OF ART

REGISTER OF INTERESTS POLICY AND PROCEDURE

1. SCOPE

1.1 This policy and procedure applies to:

- All members of GSA's Board of Governors irrespective of the method or basis of their appointment (including the Chair of the Board, Independent Governors, Ex Officio Governors, Elected Staff and Student Governors, and Trade Union Governors).
- The Director of Finance.
- Secretary and Registrar.
- All Senior Officers.

2. INTRODUCTION

- 2.1 As set out in GSA's Statement of Corporate Governance, GSA maintains and publicly discloses a current Register of Interests of its Board of Governors and Senior Officers.
- 2.2 GSA is committed to conducting its business fairly, honestly and openly. GSA's practice will align with the *Nine Principles of Public Life in Scotland* and the expectations of charity trustees with regard to conflicts of interest in terms of the Charities & Trustee Investment (Scotland) Act 2005 and guidance from the Office of the Scottish Charity Regulator. GSA's expectation is that those connected with its Board of Governors, will conduct themselves in accordance with high standards of integrity, honesty and transparency. Obtaining declarations of interest and the compilation and maintenance of a comprehensive register of interests is central to GSA's approach to encouraging openness from its Board and Senior Officers.
- 2.3 The purpose of the Register of Interests is to provide information to the Board of Governors and to the public about the business interests of all Governors and members of the School's executive which might influence their judgement, decision making and actions, or which might be reasonably perceived by a member of the public as doing so (or having the potential to do so).
- 2.4 The Register does not cover all interests, but specifically those from a business perspective relevant, or potentially relevant, to an individual's role as a Governor or as a Senior Officer. However, individuals are in the best position to know whether any other private, professional, familial, financial, personal or material interest should be disclosed and where there is uncertainty, they should err on the side of caution and seek advice from the Secretary and Registrar.
- 2.5 This policy should be read in conjunction with GSA's *Anti-Bribery and Corruption Policy* and the *Gifts, Hospitality, Material Benefits or Services Policy of the Board of Governors*.

3. THE REGISTER OF INTERESTS

- 3.1 On appointment, members of the Board of Governors, the Director of Finance, the Secretary and Registrar and all Senior Officers are required to complete and return a signed *Register of Interest Declaration Form*, including a nil return where appropriate.

- 3.2 Individuals must ensure that the information contained about them in the Register is complete and up to date at all times. The general principle is that individuals should disclose in the Register any interest, as noted in 2.4 above, which, if publicly known, could reasonably be perceived as being likely to influence the exercise of independent judgement. Individuals shall be invited to review and revise the information contained about them in the Register at least once every year. Outside of that annual review, individuals have a positive obligation to advise of any significant changes in interests which occur during the academic session, and any change in interests should be notified immediately to the Secretary.
- 3.3 The Register of Interests is compiled from the individual declarations and is maintained by the Corporate Governance Office. In line with requirements of the Scottish Code of Good HE Governance (2023)¹, the Register is available for public inspection and is published on GSA's website.

4. GUIDANCE ON COMPLETION OF THE DECLARATION FORM

- 4.1 **Employment:** This covers both paid and voluntary employment and includes any agreement or consultancy arrangement to provide personal services. Name of employer, post held and the nature of the business should be stated. In the case of staff members, paid employment refers to employment other than by GSA.
- 4.2 **Appointments, Offices and Directorships:** Name of the bodies in which a position of authority (whether remunerated or voluntary) is held and the nature of the office held, including: trusteeships or participation in the management of charities and other voluntary bodies; Public Appointments, including for example appointments as a Governor at another educational institution; Elected Offices; appointments within other organisations whose decision-making could affect GSA's interests and which could give rise to duality or conflict of interest; paid and unpaid directorships and non-executive directorships in companies which are likely, or may be seeking, to do business with GSA.
- 4.3 **Family Relationships:** Details of any family relationship with any member(s) of staff or students of GSA should be provided. Family may normally be taken to include parent, sibling, spouse, partner, child, dependant, including step-relationships and those established by marriage or civil partnerships. Individuals should indicate the area within the University that the relation is working/ studying. Name or individual details are not required. Where an individual has a family relationship with any individual who may have an interest or significant role in any business or entity with whom GSA has or may have a business relationship, this should also be disclosed (for example, if a Governor's spouse is a director or senior manager in a business engaged by GSA to provide services to GSA).
- 4.4 **Membership of Professional Bodies and/or Trade Unions:** Details of membership of professional bodies should be provided.
- 4.5 **Significant shareholdings in public/private companies:** Details should be provided of: companies in which the individual owns 5% or more of the issued shares or securities; businesses which the individual owns or partly owns, which are not companies; partnerships and consultancies in which the individual is a partner (or equivalent).

¹ Detailed Provision 36: *The Institution is expected to publish the register of interests on its website, suitably redacted to take account of data protection duties, and keep it up to date. The Secretary to the governing body any other senior officer closely associated with the work of the governing body, for example the finance director, must also submit details of any interests to be included in the register.*

- 4.6 **Contracts:** Details should be provided of any involvement in contracts (including the duration) which are not fully discharged and which are: contracts for the supply of goods, services or works to GSA or on GSA's behalf and; between GSA and either the individual or anybody, business or person which the individual requires to identify under this policy.
- 4.7 **Formal positions or connections with other Higher Education Institutions:** Details of any remunerated or honorary positions and other connections with educational establishments which may give rise to a conflict of interest should be disclosed.
- 4.8 **Any Other Material Interest:** Details should be disclosed of any other material interest which reasonably could be regarded as potentially prejudicial to the open, objective and impartial discharge of the individual's role as a Governor of members of staff.
- 4.9 Where a nil return is appropriate, then N/A should be entered against each section on the declaration form. The declaration should then be signed and dated by the individual marking it.

5. **DECLARATIONS OF INTEREST AND CONFLICTS OF INTEREST**

- 5.1 A School wide conflict management policy and plan will clearly set out the nature of applicable conflicts of interest, any measure to be taken if deemed appropriate, and a record of arising conflicts maintained by the Secretary and Registrar

Conduct in meetings:

- 5.2 The Register of Interests does not obviate the duty of members of the Board of Governors to declare relevant interests in meetings in accordance with Section 9 of GSA's Statement of Corporate Governance.
- 5.3 A member of the Board of Governors who has a financial, family or other interest in any matter under discussion, at any meeting of the governing body or one of its committees at which they are present, must, as soon as practicable, disclose the fact of this interest to the meeting. It is their responsibility to do so. The same requirement applies to the Secretary and all Senior Officers who are present.
- 5.4 Where a member of the governing body has declared a conflict of interest with respect to a given matter, the member in question must withdrawn from participation in relevant business. Upon withdrawal from the meeting or any part of it, such member may no longer form part of the quorum for the meeting.
- 5.5 A member of the Board of Governors is not considered to have a financial interest in matters under discussion merely because they are a member of staff or a student of the Institution. Nor does the restriction of involvement in matters of direct personal or financial interest prevent members of the Board of Governors from remaining at a meeting which is considering, and voting on, proposals to ensure the Board of Governors against liabilities which it might incur.

**THE GLASGOW SCHOOL OF ART
REGISTER OF INTEREST DECLARATION FORM 2024/25**

Please refer to the Register of Interests Policy before completing this form. Should you have no declared interests under each section, please put N/A in answer to each statement.

Personal Details		
Title:	Forename:	Surname:
Position at GSA:		

Declared Interest
Employment (details of any employment, including voluntary, and any agreement to provide professional services):
Appointments, Officers and Directorships (details of bodies in which a position of authority – whether remunerated or voluntary – is held and the nature of the office held):
Family Relationship (indicate the area within GSA where the relation is working and/or studying; and/or the relevant role/ interest of the family member. Name or individual details are not required):
Membership of Professional Bodies and/or Trade Unions:
Significant Shareholdings in Public / Private Companies:
Involvement in Contracts:
Formal Positions or Connections with other Higher Education Institutions:
Any other Material Interest:

Register of Interests Declaration

All decisions should be taken solely in terms of GSA and the public interest. They should not be influenced by financial or other material benefits for the decision-makers, their families or their friends.

I confirm that I have read and understood GSA's guidance on its Register of Interests and that I have completed the Declaration in accordance with that guidance and underlying principles.

I confirm that I understand and agree to this information being held on the Register of Interests and published on GSA's website for reasons given in the Register of Interests Policy and in compliance with the General Data Protection Regulation (GDPR) 2018.

Name:

Date:

(If this form is completed and returned electronically, please type your name and the date in the spaces above, which will be taken as an "electronic signature" on receipt by GSA)

Please return to:

Corporate Governance Office
governance@gsa.ac.uk