

Dear Guy,

Re: Conflict of Interest Regulations (including close personal relationships)

We are writing to note our concerns with the latest draft of the Conflict of Interest Regulations, namely, section 8.1 'Close personal relationships' and 8.2 'Personal relationships between members of staff'.

UCU reps have expressed their concerns several times, and although the latest draft does remove the troublesome term 'platonic', it still contains what we consider unnecessary and unwarranted requirements.

UCU is in full agreement with the current Conflict of Interest Regulations:

8.4 Staff and personal relationships

Where there is a family or personal relationship between two members of staff, neither member of staff should be involved in any decision or process affecting the other, including promotion, remuneration, discipline or grievance.

8.5 Staff recruitment

All staff recruitment should be carried out in accordance with the University's Recruitment Guidelines. Any member of staff or member of Council who has a family or social connection with any of the applicants should take no part in the selection process.

The principle here is that a member of University of Bristol staff effectively recuses themselves from a specific University procedure where their impartiality is questionable. This is vital to the fair, impartial treatment of staff at the University of Bristol. We would be supportive of attempts to clarify the existing clauses – 8.4 and 8.5 - of the existing Regulations, for example, adding extra examples of 'decision or process'.

The shift in the proposed Regulations – the incorporation of a previous Draft University of Bristol Policy on Close Personal Relationships – moves away from a focus on guaranteeing the impartial, professional sanctity of specific University procedures to staff having a duty 'to disclose close personal relationships' at risk of disciplinary action (...failure to disclose).

This shift is surely beside the point. It is an intrusive attempt to manage the unmanageable. It is a fact that we all develop relationships with our colleagues; indeed it would be strange if collegiality never extended into friendship. What is therefore crucial is that these relationships do not affect our formal, University-tasks decision-making roles i.e. a question of removing ourselves or declaring an interest when we are a 'decision-maker'.

To put the emphasis on reporting the personal relationship itself, as a matter of effective contractual obligation, is to potentially intrude into individual staff's private life without any due cause. It is not 'appropriate and important to know about such relationships', nor should it be linked in any shape or form to acceptable behaviour and conduct. It is important that any perceived bias or impartiality stemming from a personal relationship does not intrude into decision-making procedure; the relationship itself should not be held up to scrutiny or formal comment by other parties.

We have existing policies on 'acceptable behaviours', and guidance on 'professional behaviours' and 'leadership attributes'. The last, for example, refers to consulting 'beyond the narrow bounds of cliques', and to the need for 'integrity, fairness and consistency' in decision making. It is, therefore, hard to see what issue that could potentially emerge from a 'close personal relationship' is not adequately dealt with by existing policy and guidance.

UCU has also highlighted the vague, capricious framing of 'close personal relationships'. As is in the document, there is far too much scope for interpretation of 'personal relationships' as a tool to discipline staff on the basis of subjective definition of a perceived close personal relationship. How can one begin to define 'close friendship' for example?

In short, UCU supports the current Conflict of Interest Regulations clauses on personal relationships. We would be happy to beef these up with more examples of decision-making processes. But we do not see the for need for such an expansive and intrusive close relationships policy element to the current Regulations.

Kind regards,

Tracey Hooper, University of Bristol UCU President

James Thompson, University of Bristol UCU Vice-President

Jamie Melrose, University of Bristol UCU Branch Secretary