

**Green Templeton College
University of Oxford**

Conflict of Interest Policy and Procedure

Introduction

1. In line with the University GTC encourages its members to engage in a wide variety of external activities, such as serving on government, business and community boards, providing expert advice, media commentary, professional practice, schools outreach, international projects and collaborations with the commercial world, including via consultancy, research and development, intellectual property (IP) licensing and involvement in 'spinout' companies.
2. The College considers that such activities are in the public interest and are also of benefit to the College and the individuals concerned.
3. On occasion, however, they may give rise to conflicts of interest, whether potential or actual, perceived or alleged.
4. All College members are required to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided.
5. If properly managed, activities can usually proceed as normal whilst at the same time upholding the person's obligations to the College, meeting regulatory and other external requirements and protecting the integrity and reputation of the College and its members. By contrast, conflicts which are not managed effectively may jeopardise the College's public standing and charitable status possibly causing serious damage to the reputation of the College and of the individuals concerned.
6. It is therefore the College's policy to encourage and foster external activities whilst ensuring that when conflicts or perceived conflicts of interest arise they are acknowledged and disclosed, and in relevant cases, properly managed.

Scope

7. This Policy applies to all members of the College including fellows, staff and students, to all external members of College and its committees and all others working in the College, for example retired members who are still active in the College. A reference in this Policy to staff or students includes any person within the scope of the Policy.
8. It is the responsibility of each individual to recognise situations in which he or she has a conflict of interest, or might reasonably be seen by others to have a conflict, to disclose that conflict to the appropriate person and to take such further steps as may be appropriate as set out in more detail under the procedure below.
9. If an individual is uncertain about how this Policy might affect his or her activities or has any questions about its application, he or she should contact the Bursar.

Recognising Conflict of Interest

10. A conflict of interest arises where the commitments and obligations owed by an individual member of staff or student to the College or to other bodies, for example a funding body, are likely to be compromised, or may *appear* to be compromised, by:
 - a. that person's personal gain, or gain to immediate family (or a person with whom the person has a close personal relationship)*, whether financial or otherwise; or
 - b. the commitments and obligations that person owes to another person or body.
11. There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. Thus it is important for all staff and students when evaluating a potential conflict of interest to consider how it might be perceived by others.
12. The duty to declare a possible conflict applies to the perception of the situation rather than the actual existence of a conflict. However, the duty is not infringed if the situation cannot reasonably be regarded as likely to give rise to a conflict of interest.
13. Conflicts of interest may be financial or non-financial or both. Further information about both types is set out below.

Financial conflicts of interest

14. A financial conflict of interest, for the purposes of this Policy, is one where there is or appears to be opportunity for personal financial gain, financial gain to close relatives or close friends, or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions.
15. Financial interest means anything of monetary value, for example:
 - a. payments for services;
 - b. equity interests (e.g. stocks, stock options or other ownership interests); and/or
 - c. intellectual property rights (e.g. patents, copyrights and royalties from such rights).
16. The level of financial interest is not the determining factor as to whether a conflict should be disclosed. What might be 'not material' or 'not significant' for one person might be very significant for another. Good practice in many situations will mean the disclosure of 'any' financial interest, however small. A conflict will arise if the interest might provide, or be reasonably seen by others, to provide an incentive to the individual which affects their actions and where he or she has the opportunity to affect a College decision or other activity (because for example he or she is the decision-maker or the principal investigator on a research project). For examples of conflicts involving financial interest see Annex A.

Non-financial conflicts of interest

17. Non-financial interests can also come into conflict, or be perceived to come into conflict, with a person's obligations or commitments to the College. Such non-financial interest may include any

benefit or advantage, including, but not limited to, direct or indirect enhancement of an individual's career, education or gain to immediate family (or a person with whom the person has a close personal relationship)*. For examples of non-financial conflicts of interest see Annex A.

Procedure

18. It is the duty of every member of staff or student to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest. Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest.
19. The general rule, with the exception of committee business (see [paragraph 27](#)), is that disclosure should be made *at the time the conflict first arises, or it is recognised that a conflict might be perceived*, in writing to the Vice Principal or Bursar. If the Vice Principal or Bursar has an interest in the matter to be discussed, the disclosure shall be to the Principal.
20. In the case of students, the student should discuss the relevant issues with the Dean, who, where appropriate, will consult with the Vice Principal or Bursar following which an approach for dealing with the conflict might be agreed.
21. Many situations will require nothing more than a declaration and a brief written record of that declaration, which must be held in the College's records.
22. Some instances will, however, need to be dealt with by agreeing how the conflict can be actively managed. The approach adopted should be documented and copies provided to the relevant parties. A copy of the final plan must be held in the College's records. One or more of the following strategies may be appropriate to manage the conflict of interest:
 - a. not taking part in discussions of certain matters;
 - b. not taking part in decisions in relation to certain matters;
 - c. referring to others certain matters for decision;
 - d. resolving not to act as a particular person's supervisor;
 - e. divesting or placing in trust certain financial interests;
 - f. publishing a notice of interest;
 - g. standing aside from any involvement in a particular project; and/or
 - h. declaring an interest to a particular sponsor or third party.
23. It is the responsibility of those affected to comply with the approach that has been agreed.
24. Any unresolved matter shall be referred to the General Purposes Committee (GPC) for advice or resolution.

25. Guidance on situations that are frequently encountered and which may give rise to particular kinds of conflicts requiring special action is set out at Annex B.
26. Declaration of external interests: in addition to declaring any conflict or potential conflict in accordance with the procedure above, all members of the Governing Body are asked to complete a declaration of interest return upon appointment and declaration of interests return annually thereafter. A declaration of interest form is at Annex C.
27. Committee meetings:
- a. at their first meeting of the academic year, each committee within the College should have a standing item on their agenda about conflict of interest. This item should cover what a conflict of interest is and how the members of the committee should declare such an interest if and when such a circumstance arises.
 - b. it is also recommended that committees adopt the practice of asking at the start of each meeting whether members have a conflict of interest with any items on the agenda and including a similar statement to the following in each agenda:

'Members of [Name] Committee will be asked to declare any interest that could give rise to conflict in relation to any item on the agenda at the beginning of the item in question. All interests so disclosed will be recorded in the minutes of the Committee. If the chairman of the meeting deems it appropriate, the member shall absent himself or herself from all or part of the Committee's discussion of the matter.'
28. The College's Conflict of Interest policy places the onus on the individual involved to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts and to ensure that such conflicts are seen to be properly managed or avoided.
29. Persons with grounds to inspect declarations of interest shall be allowed access at the discretion of the Principal.

The role GPC in regard to conflict of interest

30. The Committee shall be responsible for:
- a. advising Governing Body on conflict of interest matters;
 - b. monitoring the College's Policy on Conflict of Interest and making recommendations in the light of experience, and of good practice guidelines established by outside bodies;
 - c. ensuring that there are appropriate systems in place to promote and monitor compliance with the Policy on Conflict of Interest;
 - d. reviewing the register of Annual Declarations of Interest and alerting the Governing Body where further clarification or action is required.

Review of the Conflict of Interest Policy

31. This Policy shall be the subject of regular review by GPC and, as necessary, Governing Body, such review to take place in the light of guidance on best practice issued by outside bodies and, in any event, not less than once every three years.

* For the purpose of this policy, 'immediate family' is defined as follows: spouse or civil partner, son, daughter. However, the 'close personal relationship' giving rise to an interest could extend to the following (this is not intended to be an exhaustive list): unmarried partner, parent, brother, sister, grandparent, grandchild, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, daughter-in-law, the (unrelated) child of an unmarried partner, as well as adopted, half and step members of family.

Illustrative Examples of Conflict of Interest

Financial interests:

Examples of situations in which financial declarations of conflicts of interest are made:

1. Staff of the College serving on other bodies, e.g. research council committees, grant review panels, editorial boards etc, will typically be asked by those parties to declare financial interests.
2. Authors submitting a manuscript must disclose any 'significant financial interest' or other relationship with the manufacturers of any commercial products or providers of commercial services discussed in the manuscript and any financial supporters of the research. The intent of such disclosures is not to prevent an author with a significant financial or other relationship from publishing a paper, but rather to provide readers with information upon which to make their own judgments.

Research:

Examples of situations that give rise to conflicts of interest in research include:

3. The researcher has a financial interest in the company sponsoring the research, this being exacerbated if the value of the researcher's interest may be affected by the outcome of the research. The researcher is an inventor of patents or creator of other IP whose value may be affected by the outcome of the research.
4. The researcher holds a position in an enterprise (e.g. as director) that may wish to restrict (or otherwise manage) adverse research findings for commercial reasons or not wish to publish the results of the research.
5. A researcher or a related body in which the researcher has an affiliation or a financial interest may benefit, directly or indirectly, from dissemination of research results in a particular way (including any unwarranted delay in or restriction upon publication of such results).
6. A researcher conducts a clinical trial which is sponsored by any person or organisation with a financial interest in the results of the trial. A postgraduate research student conducts research on a project that receives support from a company in which the student has a financial interest or significant position.
7. Some research funding agencies set specific disclosure requirements related to financial interest. They may require, for example, direct notification to them or to College officials where a principal investigator's financial interests might reasonably appear to be affected by the outcomes of the research. Some types of research, e.g. clinical trials, also require additional declarations related to financial interest. Researchers need to be aware of and comply with those specific requirements. Further information can be found in the terms and conditions of the grant or contract.

Student supervision and teaching:

Examples of situations that give rise to conflicts of interest in relation to student supervision and teaching include:

8. Staff with a close personal or familial relationship with a student or a student's family who may be involved in decisions about that student's admission, supervision or academic progress, or the award of any studentships, prizes or other grants to the student.
9. A member of staff who is in a position to judge the quality of a student's work or to evaluate a student in any way holds or proposes to take a financial stake or hold a formal position in any student-run, -owned or -controlled commercial venture whilst that student is enrolled at the College.
10. A postgraduate research student receiving support from a company in which his/her academic supervisor has a financial interest or position.

Other examples of possible conflicts of interest:

11. Participating in the appointment, hiring, promotion, supervision or evaluation of a person with whom the staff member has a close personal relationship.
12. A staff member takes part in the negotiation of a contract between the College and a company, where the staff member or his or her family or a close personal friend has a financial or non-financial interest (e.g. a directorship) in that company.
13. An academic who has a senior editorial position with a commercial journal is also on a College library committee that recommends journal subscriptions.
14. An academic chairs a College committee which is to consider the allocation of funds to be shared between a number of projects, including his own.

Annex B

Further Procedural Guidance: Additional steps required in specific circumstances

General Rule

1. As explained in [paragraph 19](#) the general rule is that disclosure should be made at the time the conflict first arises, or it is recognised that a conflict might be perceived, in writing to the Vice Principal or Bursar. If the Bursar or vice Principal has an interest in the matter to be discussed, the disclosure shall be made to the Principal.

Research

2. Where any researcher has a conflict of interest, they must follow the procedures described in [Annex A](#). A researcher must also comply with the following:
 - a. *Clarification by principal investigators of any personal interests*: to assist the assessment of situations which could lead to a real or perceived conflict of interest at the stage of applying for a research grant, or negotiating a contract the College requires all principal investigators to clarify whether they have any personal interest (shareholding, consultancy, directorship, etc.) in relation to the proposed sponsor.
 - b. *Ethics*: researchers must also comply with specific declaration requirements as laid down by the University (or appropriate) Ethics Committee;
 - c. *Requirements of funding bodies*: some funding agencies set requirements relating to conflict of interest. They may, for example, require direct notification of certain interests to them; reserve the right to review the proposed plan for managing the conflict of interest; and/or prohibit grant holders from undertaking certain activities. Researchers need to be aware of and comply with those specific requirements;
 - d. *Financial interest in a company involved in a biomedical or clinical research project*: this is an area that attracts particular attention given the often very significant financial consequences of research outcomes and the potential harm to members of the public engaged in clinical trials or under treatment. The circumstances determine whether there is a conflict of interest, not the outcome.¹ Staff or students who have a financial interest in a company that may reasonably appear to be affected by the results of a proposed biomedical or clinical research must disclose that interest;
 - e. *Student receiving support from a company in which his or her supervisor has a financial interest, or where the outcomes of the research are related to the activities of such a company*: to preserve the integrity of the research the student and academic must disclose the.

¹ Kassirer, J.P., and Angel, M., editorial, N. Eng. J. Med. 1993; 329:570-1.

Sale, supply or purchase of goods or service

3. Staff must ensure the probity of all financial transactions. The sale or supply of goods by the College or the purchase of goods or services by the College must be carried out in accordance with the College's Financial Regulations. Staff should not normally be involved in supply or purchase decisions in relation to any external organisation in which they or any members of their family or any person with whom they have a close personal relationship have a financial interest or in any way have the capacity for personal gain. If there are exceptional circumstances that prima facie require such involvement, the following process should be followed:
 - a. the person should disclose, in writing to the Vice Principal or Bursar, the nature of the transaction, the potential conflict and the method proposed to manage the conflict.

Developing a Plan of Action (please expand the rows/boxes as necessary)

1. Name and position of the person making the declaration	
2. Date of the initial declaration	
3. Name and position of the person to whom the declaration is being made	

Issue/Question	
4. Brief Description of the Conflict of Interest (Col) or potential Col	
5. What decisions or interests of or within the College might be or be seen to be affected by the Col/potential Col?	
6. What actions might be taken to manage or avoid the conflict?	

Following discussions

Issue/Question	
7. Describe here the course of action agreed	

<p>8. Which individuals, groups or organisations need to be informed about the Col and the course of action agreed?</p> <p>9. Who will inform them, how and when?</p>	
<p>10. Do you wish to review the situation and this plan at some point in the future? (If so, agree and note when and who will initiate that review/further discussion)</p>	

Sign-off by the relevant parties (add further rows as appropriate)

Name	Signature	Date

DECLARATION OF INTERESTS

The College’s [Policy on Conflict of Interest](#) requires that individuals in specified categories submit a declaration of interests to the Bursar on an annual basis

Section 1	Personal details ⁱ
Name	<input style="width: 100%; height: 25px;" type="text"/>
Role (delete/circle as applicable)	<input style="width: 100%; height: 25px;" type="text"/>
Email	<input style="width: 100%; height: 25px;" type="text"/>
<hr/>	
Section 2	Declaration of interest ⁱⁱ
<p>The purpose of this declaration is to ensure that conflicts of interest are properly managed.</p> <p>Please provide information on any financial or other interest, benefit or relationshipⁱⁱⁱ. Examples of interests are given on the last page of this form. Of particular relevance are those interests that might reasonably be thought to influence your actions or judgment in the role specified in Section 1. Please include interests held at the date of this declaration, any interests held in the 12 months prior to that date and any known future interests. If you have no such interests, please submit a nil return. Please indicate whether, to the best of your knowledge, the body concerned has any dealings with the University or any University subsidiary.</p>	
Name of organisation	Details of interest
<input style="width: 100%; height: 60px;" type="text"/>	<input style="width: 100%; height: 60px;" type="text"/>
<input style="width: 100%; height: 60px;" type="text"/>	<input style="width: 100%; height: 60px;" type="text"/>
<input style="width: 100%; height: 60px;" type="text"/>	<input style="width: 100%; height: 60px;" type="text"/>

	<p>I understand that I am under a duty to disclose promptly any potential conflict of interest that may arise after submission of this form.</p>	
Signed		Dated
<p>Please return the form in hard copy or by email to^{iv}:</p>	<p>Bursar Green Templeton College 43 Woodstock Road Oxford OX2 6HG paul.beerling@gtc.ox.ac.uk</p>	

If you have signed this declaration but want to make any information known or clarify any points, please add them in the space below.

i The information given on this form will be kept securely and in accordance with the Data Protection Act 1998. The form may be inspected at the discretion of the Chairman of GPC and may be provided to HM Revenue & Customs.

ii The College's Policy on Conflict of Interest provides further information, including illustrative examples. All members of the Governing Body are to complete a declaration of interest return upon appointment and a declaration of interest annually. In addition, it is the responsibility of the individual to declare any potential conflict at the relevant time to the relevant person, for example, to the chair at a meeting before discussion of an item in which the individual has a potential conflict of interest. Members of staff are reminded that, in addition to declaring all conflicts of interest, they are responsible for obtaining approvals for the holding of outside appointments and undertaking outside work in accordance with the College's Statutes and Regulations.

iii The following may be helpful as a guide to the kinds of interests likely to be included and the information to be provided:

<i>Please give the start date of the interest (and the end date if known) and include interests held in the last 12 months, current interests and future interests</i>	
Directorships (including non-executive directorships)	Name of company, nature of business (if not self-evident) and position held
Consultancies	Name of consultancy and nature of business
Partnership in a business or sole trader	Name and nature of business
Membership of official committees, such as those of a government department, research council, professional institution or advisory body to an industrial company	Name of committee, role (if not self-evident) and organisation
Trusteeships (charitable and other)	Name of trust and nature of business
Public appointments (whether remunerated or not)	Appointing body and office held
Organisations from which you receive financial support or which could benefit significantly from your position or in which you have a financial interest, board responsibility or ongoing consulting involvement	Name of organisation, nature of activity and role
Shareholding in excess of 5% in any company trading in an area related to your position	Name of company and nature of business
Any of the above interests held by a member of your immediate family or any person with whom you have a close personal relationship	Details of interest and relationship

iv Members of the College emailing the declaration are asked to send it from an Oxford email account.