

CONFLICT OF INTEREST POLICY FOR ACADEMIC & RESEARCH STAFF

DECEMBER 2017

Research & Enterprise Conflict of Interest Policy

1. Background

City has developed a policy on the management of conflicts of interest to ensure that activities undertaken by its research and academic staff are conducted to the highest standards of ethics and integrity.

The policy is in line with the [Concordat to Support Research Integrity](#), which seeks to provide a comprehensive national framework for good research conduct and its governance. As part of its obligations under the Concordat, City has to report annually to HEFCE on meeting such obligations including how successfully it manages conflict of interest cases.

2. Purpose

The purpose of the policy is to:

- define conflict of interest
- manage conflict of interest in early stages so research and enterprise activities can proceed as normal.
- assist in the resolution of conflict of interest while protecting the institution and its employees.
- ensure that staff are aware of the importance of complying with this policy as well as related disciplinary procedures.

3. Scope

This policy applies to all research and academic members of staff, and their research and enterprise activities at City.

4. Definitions

Conflict of interest is a set of circumstances where an individual's professional judgement is likely to be influenced inappropriately by a personal or commercial interest. A personal or commercial interest may include, but not limited to, financial gain; professional recognition; advancing the career or the education or the personal life of family or friends, or/and other members of staff or students.

A conflict of interest could be actual or perceived*. They are both equally damaging to the outcome of a decision, and are therefore treated equally.

*A perceived conflict of interest arises when a researcher's or academic's decision could be questioned based on a personal or commercial interest that may have impacted a decision; hence, it is important for a researcher or academic to think beforehand how this decision or action may be viewed by others, and whether there are risks for them or the institution.

5. Responsibilities

All research and academic staff working at City must comply with this policy. It is an individual's responsibility to report any potential conflict of interest to their manager, Head of Department/Faculty/Division.

It is recommended that any conflict of interest is declared to the research participants and funders.

If there is uncertainty whether there is an actual conflict of interest, the individual must seek advice from a senior member of staff as defined above.

6. Procedures

6.1. Disclosing Conflict of interest

Conflict of interest that might be anticipated must be declared before the researcher or academic engages in any activity. If that is not possible, any potential conflict of interest must be declared as soon as the researcher or academic becomes aware of such conflict. Written permission must be obtained from the Head of Department/Faculty/Division (or Associate Dean for Research & Enterprise when applicable).

6.2 Managing Conflict of interest

- i. This policy must be read in conjunction with the [Code on Professional/Consensual Relationships](#).
- ii. Once the conflict of interest has been declared, each incident (examples included as Appendix A) must be recorded including a description of how the researcher or academic intends to manage the conflict of interest. The documents must be stored in the departmental shared drive where files must be encrypted with a password.
- iii. The person responsible for overseeing this process is the Head of Department or a designated senior academic member of staff. It is important to note that declaring conflict of interest does not automatically mean exclusion from the activity in question. The policy is not there to question the integrity of its staff, but to rather protect staff and City from any reputational damage. Therefore, a discussion ought to happen between the Head of Department and the researcher or academic to determine whether it is acceptable to start working on the project, and whether the benefits outweigh the risks. **This section should be read in conjunction with section vi.**
- iv. In case the conflict of interest relates to an application for a research grant or contract or consultancy project, the individuals responsible for approving the application or signing the contract must be aware of that conflict (e.g. Contracts Manager or Director of Research & Enterprise).
- v. You will have to declare any conflict of interest when applying for ethical approval. Please contact the [Research Ethics Committee](#) for further information.

- vi. All conflicts of interest must be declared through the Annual Declaration of Interest Form. The form will be sent out by the Associate Deans for Research & Enterprise to all academic and research staff once a year. The first form should be sent out by **March 2018**.
- vii. Any breach of this policy will be taken seriously and may result in disciplinary action. This policy must be read in conjunction with City's [Disciplinary Procedure](#) and [Dismissal Procedure](#) and they will be used when appropriate.
- viii. Failure to disclose conflict of interest promptly will lead to an investigation by the Head of Department or a designated senior academic member of staff. The investigation would normally entail a meeting between the investigator and the member of staff. If the preliminary information shows that the conflict of interest is significant, the investigator can invite up to two independent senior members of staff to join the investigation. After the investigation has been completed, findings must be recorded (process as described in section ii) regardless of whether any actual or perceived conflict of interest was found. Human Resources should be also notified and the [Disciplinary Procedure](#) should also be considered at this stage.
- ix. If a conflict of interest is found, the following course of action must be taken:
 - a) If conflict of interest is insignificant:
Record and store findings without taking any further action.
 - b) If a conflict of interest is significant:
 - Remove the individual from certain matters of the decision-making process.
 - Remove the individual from all aspects of the decision-making process.
 - Declare an interest to a funder, sponsor or third party.

Significant conflict of interest is defined as an interest that is so compelling that it can influence the researcher's or academic's opinion. For example, hiring a relative/family member to participate in a research project from which they can benefit financially or in other ways.

Insignificant conflict of interest is defined as an interest that is so remote in its nature that it is unlikely to influence the researcher's or academic's opinion.

Related policies

[Code on Professional/Consensual Relationships](#)

[Financial Regulations](#) (sections 2.5.3, 2.5.4)

[Senate Regulation 5b Standing Orders for Board of Studies and their Sub-committee](#)
(section 10)

[Ordinance D7 Declaration of Interest](#)

Appendix A

The following is not an exhaustive list of potential conflicts of interest, but it demonstrates the most common types:

1. **Personal relationships:** The direct or indirect participation in the selection, approval or administration of any business arrangements between City and a spouse, family member, relative or friend.
2. **Business arrangements:** The direct or indirect participation in the selection, approval or administration of any business arrangements between City and an external company while having a financial or non-financial gain/interest (e.g. including payment above normal salary, holding shares or a directorship); or taking personal gain from what should be an opportunity for the institution.
3. **Affiliation with other higher education institutions:** For example:
 - an academic or researcher is working both at City and UCL. They should not prioritise one institution over the other in their discussion with students or funders.
 - A City academic or researcher holds an honorary contract with LSE; although they could state their affiliation with LSE in their publications, they **must** state their primary organisation, which is City, University of London.
4. **Gifts:** The acceptance of any gifts that can influence the outcome of a decision making process. Please also see further information on the [Financial Regulations](#) (section 2.5.4).
5. **Confidential information:** The use or disclosure of confidential information for direct or indirect personal interest.

Policy Identification Number	
<i>Policy ID to be inserted by SP&P</i>	
Policy Title	
CONFLCIT OF INTEREST POLICY FOR ACADEMIC & RESEARCH STAFF	
Policy Enabling Owner and Department	Responsible for Implementation and Department
RESEARCH & ENTERPRISE OFFICE	ALL
Approving Body	Date of Approval
EXECUTIVE COMMITTEE	DECEMBER 2017
Last Reviewed	Review Due Date
NOT APPLICABLE	DECEMBER 2018
Publication of Policy (<i>tick as appropriate</i>)	
For public access online (internet)? <input checked="" type="checkbox"/>	For staff access only (intranet)? <input checked="" type="checkbox"/>
Queries about this policy should be referred to	
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