

# Nuffield College

## Conflict of Interest Policy

1. The establishment of links between College staff and outside bodies - whether Government departments, commerce, industry, or others - is not only in the public interest but also benefits the College and the individuals concerned. However it is possible that such links may give rise to conflicts of interest (By-Law VIII). The College has therefore prepared the following guidelines and rules to help individuals assess whether or not proposed activities could cause a conflict of interest, and to outline the procedure for disclosure of any actual or potential conflict.

### **Guidelines as to Conflict of Interest**

2. It is not possible to define all the circumstances which may cause a conflict of interest, but the following are examples of situations giving rise to a perceived conflict of interest. In any situation where an individual is uncertain as to the propriety of a given arrangement, advice may be sought from the Bursar.

(a) Use of the College's research or administrative facilities to pursue personal, business, commercial, or consulting activities.

(b) Any attempt to restrict rights governing the timing and content of publications, except in circumstances properly approved by the College to protect privacy, commercially sensitive proprietary information, and patentable inventions.

(c) Involvement in externally funded activity which might infringe the right of a student engaged in the activity to complete the degree for which he or she is registered, and/or to publish freely his or her findings (except in the circumstances referred to in sub-paragraph (b) above).

(d) A financial interest held by an individual (or by his or her immediate relative(s) or household member(s)) in an external enterprise engaged in activities closely related to that individual's line of research in the College. Examples of such interests are paid consultancies, paid service on a board of directors or advisory board, or equity holdings in or royalty income from the enterprise. The existence of such an interest does not necessarily imply conflict, but is likely to give an appearance of conflict, and should be declared.

(e) A personal involvement (or by his or her immediate relative(s) or household member(s)) in any company or commercial enterprise which is in a contractual relationship with the College, or which is in the process of negotiating a contract with the University, where the employee has been concerned or connected with placing or negotiating the contract in question or with the research or other activity which the contract might cover.

(f) Application by family members or friends for employment in the College or in a related company, where an individual is in a position to influence the appointing process. (Note: the College operates specific rules on the appointment of close relatives in the same department.)

(g) Receipt of gifts or hospitality by an individual (or by his or her immediate relative(s) or household member(s)) from a company or organisation offering goods or services to the College.

3. There are in addition certain circumstances which give rise to such clear conflicts that the College has adopted the specific rules set out below.

# Nuffield College

## Conflict of Interest Policy

### **Executive Directorships**

4. For the purpose of this guidance, an executive directorship is one involving an active management role, whether or not including research, in the company concerned.
5. No member of staff shall hold any executive directorship without express approval by the Warden (or, in the case of the Warden, by the Governing Body). Approval for such directorships may be given in the following circumstances:
  - (a) where the holding of an executive directorship is or will be necessary to satisfy the requirements of a recognised stock exchange for the listing of scientific, research-based companies; and/or
  - (b) where approval can be justified on other grounds, although such approval will only be given in exceptional cases.
6. In either case, consent will be given only if it is evident that the appointment will comply with the College or the University of Oxford's general conditions relating to the holding of other appointments.

### **Declarations**

7. It is the duty of all employees to disclose any conflict of interest. The procedures for disclosure are explained below. Failure to disclose a conflict of interest may result in disciplinary action.
8. A declaration as to any conflict of interest will be sought by the College at the funding award stage in connection with any externally funded research project. Application for permission to undertake other activities will require the individual concerned to declare any conflict of interest before permission will be granted. Disclosure should be made in writing and should be directed to the Bursar. This procedure will also apply in other situations giving rise to a potential conflict of interest.
9. In addition to declaring any conflict or potential conflict in accordance with paragraph 8 above, individuals occupying the following positions shall be required to submit an annual declaration of external interests:
  - o Permanent Fellows (members of Governing Body, Ordinary Meeting)
10. A record of all declarations made shall be maintained centrally by the Bursar.
11. In addition to declarations made from time to time under the terms of paragraph 8 above, records shall be updated regularly and members of staff shall be required to provide updated information on request.
12. If a conflict of interest or a potential conflict of interest has been disclosed, the individual concerned shall discuss a possible resolution with the Bursar. Any unresolved matter shall be referred to the Audit Committee for advice; in cases of particular difficulty the matter shall be referred to the Governing Body.

# Nuffield College

## Conflict of Interest Policy

### **Committee Meetings**

13. At the first meeting of the academic year, Governing Body and every sub-committee of the Governing Body which exercises delegated authority\* shall have a standing item on their agenda about the meaning of conflict of interest and how members should declare such an interest.
14. Committees will also have a pro forma statement at the head of each meeting agenda to the effect that conflicts of interest shall be declared and recorded in the minutes of the meeting.

Approved by Governing Body 4 November 2009

\*Committees of Governing Body:

Strategy and Resources Committee

Personnel and Domestic Committee

Audit Committee

Library Committee

Information Systems Committee

Investment Committee