

# Conflicts of Interest Policy

From: University Executive Board

Date: February 2018

## INTRODUCTION

The University of Southampton (‘the University’) has developed this Conflicts of Interest Policy (‘the Policy’) in order to ensure that its activities, and those of its staff and students, are conducted to the highest standards of integrity, ethics, openness and accountability. The Policy explains what is regarded as a conflict of interest by the University, and what procedure should be followed in situations when conflict or perceived conflict of interest arises.

This Policy document comprises the following:

1. POLICY SCOPE.....	2
2. POLICY STATEMENT .....	2
3. RECOGNISING CONFLICT OF INTEREST .....	4
4. REGISTER OF INTEREST AND CONFLICTS OF INTEREST PROCEDURE.....	7
5. MANAGING CONFLICT OF INTEREST .....	9
6. FAILURE TO COMPLY WITH THE POLICY.....	10
7. FURTHER HELP AND GUIDANCE.....	10
8. POLICY REVIEW .....	10
9. RELATED POLICIES .....	11
10. VERSION CONTROL .....	11
11. ACKNOWLEDGEMENTS .....	11

## 1. POLICY SCOPE

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- 1.1 This Policy applies to all full and part time University staff, to all external members of the University's Council and its committees, anyone working in the University such as casual workers, visiting researchers, visiting academics, and consultants, as well as anyone affiliated to the University through an honorary contract, including retired members who are still conducting research under the auspices of the University. The Policy applies to all staff and directors of subsidiary companies of the University. It also applies to students who are engaged by the University to work on a particular project for the University or any third party, and to all students who are engaged in research funded by, or in collaboration with a third party as part of their degree. A reference in this Policy to staff or students includes any person within the scope of the Policy.
- 1.2 All staff and students are responsible for familiarising themselves with this Policy and ensuring that they abide by its standards, as well as associated guidance, and any external requirements, such as terms and conditions, or codes of conduct related to conflicts of interest disclosures developed by funding or governing bodies.

## 2. POLICY STATEMENT

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- 2.1 The University of Southampton is a world-leading, research-intensive institution with a global reputation for passion and ability to work collaboratively in research and innovation, and delivering world-class education. It recognises that members of its staff have diverse interests, and it encourages engagement in a wide variety of external activities, such as serving on government, business and community boards, membership of official committees, acceptance of directorships, partnerships, or trusteeships, providing expert advice, media commentary, professional practice, international projects and collaborations with the commercial world, including via consultancy, research and development, licensing of Intellectual Property (IP) and involvement in 'spinout' companies.
- 2.2 The University considers that such activities are in the public interest and carry many advantages to the University and the individuals concerned. The University wishes to give freedom to its employees to engage in external activities (in line with [all relevant policies](#)), but at the same time needs to put in place a mechanism for protecting its staff members, and itself, from criticism, reputational damage and other liabilities, by ensuring that when conflicts or perceived conflicts of interest arise they are acknowledged and disclosed, and in relevant cases, properly managed. The University recognises that it is inevitable that conflicts of interest occur, and that in general individuals will identify conflict situations and will want to ensure that there will be no perception of them receiving an inappropriate advantage. The existence of this Policy therefore does not imply lack of trust in, or the loyalty and integrity of, staff and students, but aims to provide the University with a framework for the relevant processes.
- 2.3 This Policy also aims to ensure that the University's financial sustainability and economic interests are protected. Every member of staff is obliged to act in the best interests of the University, in relation to their professional duties, activities and employment, and not to receive improper benefit due to their position, and at the expense of the University. As a result, any relevant outside interests and activities pursued by University staff and students need to meet the terms of the individual contracts of employment, the University's [Consultancy Policy](#), [Financial Regulations](#) and other relevant policies, where permission for such activities may be required. This provision is not intended however to prevent staff with official appointments or elected positions to undertake specific public duties (e.g. local government Councillors, Trade Union Representatives, judicial

appointments or similar) from executing their responsibilities in accordance with the lawful requirements of their role. Members of staff also have a common law obligation of confidentiality and fidelity to the University, and must ensure that sensitive and confidential information relating to the work or administration of the University is not improperly disclosed, either internally or externally.

- 2.4 This Policy accords with the [Seven Principles of Public Life](#) established by the Nolan Committee (selflessness, integrity, objectivity, accountability, openness, honesty and leadership) which are the basis of the ethical standards expected of public office holders. Everyone associated with the University is expected to conduct themselves with impartiality, integrity and honesty at all times and should maintain high standards of ethics, propriety and professionalism. Individuals should avoid situations where they, or the University, could be open to suspicion of dishonesty and bias, and not put themselves in a position of conflict between their various activities. The University is committed to developing and maintaining a culture of openness and accountability, and expects all staff and students to support this commitment.
- 2.5 It is the duty and responsibility of all individuals covered by this Policy (as defined in section 1 Policy Scope above) to recognise situations and activities that might give rise to conflicts of interest, or the perception of conflicts, and to ensure that such conflicts are disclosed to the **Appropriate Person** (as defined in section 4.7) and either properly managed or eliminated, as set out under the procedure below. In some situations information about conflicts of interest should be shared with relevant University faculties, departments or teams, if their work will/could be affected by the conflict of interest situation (as per point 4.13 below). A key aspect of minimising the effects of conflict of interests is to be open and transparent about such situations when they arise.
- 2.6 It is recommended that whenever a new external project or other activity is initiated, a conscientious assessment of any potential conflict(s) of interest is actively undertaken by all individuals who are going to be involved. It should be also assessed how the potential/identified conflict(s) of interest might/will affect the activity in question and/or the University in general.
- 2.7 If appropriately managed, activities can usually proceed as normal whilst at the same time upholding the person's obligations to the University, meeting regulatory and other external requirements and protecting the integrity and reputation of the University. By contrast, conflicts which are not managed effectively may jeopardise the University's public standing and may cause serious damage to the reputation of the University and of the individuals concerned.
- 2.8 Members of staff and students should be aware that some funders may have additional requirements for disclosing financial interests (for instance projects funded by National Institutes of Health (NIH)). These requirements are broader than the University's Conflicts of Interest Policy and all individuals involved will be required to complete an additional declaration form before the project can commence. Any financial interests will need to be declared annually.
- 2.9 In summary, the Conflicts of Interest Policy provides for a three-fold approach:
- **Disclose always.**
  - **Manage the conflict in most cases.**
  - **Prohibit the activity when necessary to protect the public interest or the interests of the University.**
- 2.10 The University will draw attention to this Conflicts of Interest Policy during training and induction processes for newly appointed academic, research and professional staff.

### 3. RECOGNISING CONFLICT OF INTEREST

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- 3.1 A conflict of interest arises where the professional commitments and institutional responsibilities owed by an individual member of staff or student to the University or to other bodies, for example a funding body, are likely to be, or may appear to be compromised, impaired or influenced by:
- 3.1.1 That person's individual interests, personal gain, or gain to a **Connected Person**, whether financial or non-financial, at the expense of the University or other body; or
  - 3.1.2 The commitments and obligations that person owes to another person or body.
- 3.2 For the purpose of this Policy, a **Connected Person** is anyone with whom the University staff or student has a personal or business relationship, which is likely to appear to influence their objectivity. This includes, but is not limited to familial relations, partner, spouse, close personal friends or business or personal associates<sup>1</sup>.
- 3.3 A conflict of interest includes *actual*, as well as *perceived* and *potential* conflict of interest. *Actual* conflicts are existing situations or relationships that could compromise individual's impartiality, objectivity and/or professional integrity and judgement in relation to their duties/responsibilities towards the University. A *perceived* conflict of interest is one that a reasonable person could consider likely to compromise impartiality and objectivity. A *potential* conflict of interest is a situation that does not currently constitute a conflict of interest, but where there is a significant risk that it could evolve into an *actual* or a *perceived* conflict situation. Perceived or potential conflicts of interest may undermine trust and can be as damaging as actual conflict of interest, as suspicion may arise even when staff and students act with complete neutrality and professional integrity.
- 3.4 It is therefore important for all staff and students, when evaluating a potential conflict of interest, to consider how it might be perceived by others.
- 3.5 Conflict of interest may be financial or non-financial, or both.
- 3.6 A **financial conflict of interest** is one where there is or appears to be an opportunity for personal financial gain, financial gain to a Connected Person, or where it might be reasonable for another party to take the view that financial benefits might affect the individual's actions and decisions. A financial gain refers to anything of monetary value including but not limited to pay, commission, consultancy fees, equity interests, forgiveness of debt, property, shares, gifts or hospitality, licensing income, honoraria, or Intellectual Property (IP) rights (e.g. patents, copyright and royalties from such rights).
- 3.7 The level of financial interest is not a determining factor as to whether a conflict of interest should be disclosed. What might be 'non material' or 'non-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.
- 3.8 University employees have a responsibility to respect and promote the financial interest of the University. Staff should not take inappropriate advantage of their position and wherever possible ensure that the University:
- 3.8.1 Receives appropriate financial benefit from the provision of research services, including consultancy and other services conducted through the University.

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<sup>1</sup> Please note this is not an exhaustive list.

- 3.8.2 Receives appropriate financial benefit from the use of commercialisation of its Intellectual Property.
- 3.8.3 Receives appropriate financial benefits from the use of other resources and assets, including equipment, technical staff and facilities.
- 3.8.4 Makes responsible use of its financial resources in relation to the purchase of goods and services as specified in the University's [Financial Regulations](#).
  - 3.8.4.1 Goods and services should not be procured from the Connected Person, and staff or students should not confer any competitive advantage or perceived competitive advantage to one supplier over another. The University's [Financial Regulations](#) should be followed if staff or students are offered a gift or hospitality from a supplier or a potential supplier. Further information is available on the [Finance Intranet](#).

- 3.9 A **non-financial conflict of interest** refers to any non-financial benefit or advantage including but not limited to direct or indirect enhancement of the individual or Connected Person's career, education, or professional reputation, access to privileged information or facilities and property, or Intellectual Property rights.
- 3.10 Other conflict of interest categories include (but are not limited to) the following:
  - 3.10.1 Conflict of Commitment and Loyalty (see 3.12)
  - 3.10.2 Conflict of Research Integrity (see 3.13)
  - 3.10.3 Conflict of Educational Mission (see 3.14)
  - 3.10.4 Institutional Conflict of Interest (see 3.15)
  - 3.10.5 Conflict of Interest in relation to Personal Relationships at work (see 3.16)
- 3.11 More examples of conflicts of interests, and guidance on situations that can be encountered and which may give rise to particular kinds of conflicts can be found in the **Conflict of Interest Guidance** on the Researcher Portal.
- 3.12 **Conflict of Commitment and Loyalty**

Conflict of commitment and loyalty can exist when the external activities of a member of staff are so substantial or demanding in terms of time and/or attention so as to interfere with their responsibilities to the University. Conflicts of this type primarily involve questions of obligation and effort, but may often be tied to financial remuneration or other inducements and as such may also constitute a conflict of interest.

All University employees owe commitment and allegiance to the University. Staff need to be open and transparent about any additional employment they hold, or are considering to take up, and should inform/discuss it with their Line Manager (Appropriate Person). It is important to ensure that any non-University employment does not constitute a conflict of interest or conflict of commitment, or that any possible conflicts are disclosed and sufficiently managed where appropriate. Any external appointments should be also in line with the terms and conditions of the individual contracts of employment, the University's [Consultancy Policy](#), and/or other relevant policies. Where additional employment is allowed by the University, this does not absolve the employee from ensuring that they continue to give their commitment and allegiance to the University.

Managing conflicts of commitment is primarily a matter for individual staff, their line manager, and their Dean (Faculty) or Director (Professional Service).

### 3.13 Conflict of Research Integrity

The University's employees should maintain the highest standards of integrity and ethics in the conduct of research. The potential for personal gain must not jeopardise nor appear to jeopardise the integrity and validity of research activities, including the choice of research, its design, the interpretation of results, or the reporting of such results. Staff and students should be familiar with and adhere to the University's [Code of Conduct for Research](#).

Any funding for research does not entitle the funder to influence or encourage a breach of research integrity principles, ethics or the University's Code of Conduct for Research, and in particular any misrepresentation or bias in the dissemination or presentation of the results.

### 3.14 Conflict of Educational Mission

The University has a primary objective to educate and train students. The University's employees who are involved in teaching, supervising or directing the work of students, should ensure that the education they provide is appropriate to the student. For example, special care must be taken to ensure that the choice of a student's research project, and the direction of that research is not, and does not appear to be influenced by their supervisor's personal financial interest. Similarly, any teaching provided to another institution(s) should be appropriately disclosed to the Line Manager (Appropriate Person) in line with this Policy, and meet the terms of individual contracts of employment and/or other relevant policies. Care must be taken to ensure that any assets, IP or other materials, generated at the University of Southampton are not utilised for other purposes without obtaining appropriate consent and permissions.

### 3.15 Institutional Conflict of Interest

Apart from the personal conflict of interest, the University may be also faced with the institutional conflict of interest.

Institutional conflict of interest may occur when research groups or units within the University, or individual members of staff, are involved in projects with two or more undertakings which have, or could be seen as having conflicting or competing objectives. An example of such situation may include a researcher working on a project aimed at influencing policy and standards at governmental level to reduce environmental destruction and pollution, and at the same time being directly involved with an industry whose business involves likely environmental pollution issues and whose interests are to minimise the cost associated with environmental protection measures. Another example could be the same individual researcher or group working on similar research projects with two organisations who are in direct competition with each other.

Institutional Conflict of Interest can also arise in a procurement situation. To prevent this from happening, staff and students should not confer any competitive advantage or perceived competitive advantage to one supplier over another, and should fully comply with the University's [procurement procedures](#).

### 3.16 Conflict of Interest in relation to Personal Relationships at work

Where personal relationships exist, disclosure should be made where a member of staff holds, or could be perceived to hold, a position of direct or indirect managerial, budgetary or academic authority, or has or could be perceived to have, the ability to influence decisions or give unfair advantage or disadvantage to the person with whom they have a personal or family relationship. This might also apply where there was a past relationship between staff members.

## 4. REGISTER OF INTEREST AND CONFLICTS OF INTEREST PROCEDURE

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- 4.1 All University staff at Level 4 and above, both full and part time, are required to complete and submit a Return to the University's Register of Interest. A Null Return needs to be submitted if a member of staff is not involved in any relevant external activities. The Register of Interest must be kept up to date at all times, and staff are required to review it at least once a year in October, and update if necessary.
- 4.2 This Return does not in any way replace or supersede the requirement for staff to seek permission from their Dean or Director of Professional Service for certain activities, as set out in the terms and conditions of the University's [Consultancy Policy](#) and individual contracts of employment.
- 4.3 The Register of Interest is maintained by the Human Resources (HR) and can be completed through the [MyHR Dashboard](#) on the University Intranet. It is subject to the provisions of the [Data Protection Act 1998](#) and it may be consulted by senior members of staff under specific circumstances.
- 4.4 In addition to any Register of Interest declarations, it is the ongoing duty and responsibility of every member of staff or student to recognise and disclose conflicts of interest (whether actual or potential, financial, academic, personal or otherwise) or any circumstances that might reasonably give rise to the *perception* of conflict of interest. All staff, and especially those in a position of authority, are expected to be honest, open and transparent where their personal or business relationship may, or may be perceived to influence the operation of the University business, so that the effect of the conflict situation can be minimised and appropriately managed at the earliest opportunity. The best practice is to actively consider a potential for a conflict of interest at the outset of every new activity/external project, as well as how it may/will affect the activity in question and/or the University in general.
- 4.5 If a member of staff or student is unsure whether their interests conflict, it should be assumed that a conflict of interest exists. Advice should be sought from the Appropriate Person and appropriate action should be taken. Equally, if an Appropriate Person becomes aware of the possible conflict situation which appears not to be considered by an individual employee, it should be brought to that individual's attention for appropriate consideration.

### **NB: IF IN DOUBT, ALWAYS DISCLOSE**

- 4.6 Any issues raised under this Policy should be dealt with in a prompt, fair, reasonable and objective manner, paying due attention to the effects of any actions taken on the University standing, as well as the individual's work and reputation.
- 4.7 Disclosure should be made at the time the conflict first arises, or when it is recognised that a conflict might be perceived, in writing to the **Appropriate Person** as follows:
- 4.7.1 Staff: the individual's Line Manager.
  - 4.7.2 Students and researchers: the individual's Tutor / Supervisor.
  - 4.7.3 Vice Presidents, Deans and Chief Operating Officer: the Vice-Chancellor.
  - 4.7.4 The President and Vice-Chancellor: the Chair of Council.
  - 4.7.5 Consultants: The Department or Faculty contracting for the service.
  - 4.7.6 External members of the University Council, Committees, or Panels: the relevant Chair (or in the case of the Chair the Deputy Chair).
- 4.8 If in any case the Appropriate Person has an interest in the matter to be discussed, the disclosure should be made to the person at the next higher level of authority.

- 4.9 Where the conflict of interest relates to the activities outside the control of the Appropriate Person, the conflict must be disclosed to the person responsible for those activities, and the Appropriate Person should be also informed. In cases where an employee has multiple reporting responsibilities disclosure should be reported to the primary unit head, and other superiors should be informed in writing of the potential conflict of interest situation.
- 4.10 All disclosures should include sufficient information to allow for adequate evaluation and resolution, such as:
- 4.10.1 The type of potential conflict (financial conflict of interest or conflict of commitment etc.).
  - 4.10.2 The nature of the activity.
  - 4.10.3 A description of all parties involved.
  - 4.10.4 The potential financial or non-financial interests and rewards.
  - 4.10.5 Any other relevant information.
- 4.11 A sample Declaration of Interests Form is available in the **Conflict of Interest Guidance**.
- 4.12 In all cases the disclosure, its outcome, and all subsequent decisions and actions should be noted in writing, and must be kept confidential as far as possible in line with the Data Protection Act 1998. To protect the privacy of individual members of staff or students any disclosures made should be only made available to appropriate individuals with justifiable reasons for access.
- 4.13 Staff are expected to use their judgement and consider whether the potential/actual conflict of interest is likely to have a direct or indirect effect on the University's business and integrity in general. This should be discussed with the Appropriate Person and agreed who will be responsible, if regarded as appropriate, for informing all relevant University departments, faculties or teams which will/could be affected by the conflict of interest situation. This will be needed where the relevant department, faculty or team is advising on, deciding on, or negotiating a matter under the instructions of the individual with potential/actual conflict of interest, and where withholding such information could have a detrimental effect on the University's business and/or integrity, and be seen as dishonest and unethical conduct. This may include, but is not limited to informing:
- 4.13.1 Finance
  - 4.13.2 Procurement
  - 4.13.3 Human Resources
  - 4.13.4 Relevant team within Research and Innovation Services (RIS)
- Any disclosures received by the affected departments, faculties or teams must be kept confidential as far as possible as per point 4.12 above.
- 4.14 Where a conflict of interest relates to an individual's role on a University Committee, Panel or Group, it should be discussed with the Chair of the Committee, Panel or Group in the first instance. If the disclosed conflict of interest is substantial and cannot be managed, the individual should recuse themselves and no longer participate in any discussions or decision making process. If the Chair has an interest in the matter disclosed, a Deputy Chair should be appointed to review the conflict of interest and decide what further steps should be taken to manage it appropriately. Any disclosure should be made at the earliest possible time.
- 4.15 The Appropriate Person shall advise the Dean or Director of Professional Service of all disclosures. The Dean or Director of Professional Service may also serve as an advisor to staff members who are uncertain regarding the appropriateness of a given activity, or management of a given disclosure issue. It is therefore incumbent upon them to be familiar with the University policies, and with general legal requirements, so as to understand fully the implications of the situation in

question. If the conflict situation involves the Dean or Director of Professional Service, it should be disclosed to the person at the next higher level of authority, as per points 4.7 and 4.8 above.

- 4.16 The Appropriate Person, the Dean or Director of Professional Service, or the person at the next higher level of authority, if appropriate, may consult or engage Legal Services, Research and Innovation Services (RIS), Finance, or other relevant departments/teams, to advise on the issues of budget and finance, research administration, government relations or technology transfer. Any information shared must be kept confidential as per point 4.12 above by all the parties receiving it.
- 4.17 Any allegations of conflict non-disclosure may be raised under the University's [Whistleblowing Policy](#) which shall apply as appropriate in relation to conflicts of interest, and those raising concerns in good faith will not be penalised.

## 5. MANAGING CONFLICT OF INTEREST

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- 5.1 As stated in sections 2.5 and 4.4, it is the ongoing duty and responsibility of every individual to identify and declare, by informing the Appropriate Person, any real or perceived conflict of interest as soon as they become aware of it.
- 5.2 Any disclosure made should be followed up by conflict evaluation and conflict management if appropriate. Once all the facts regarding the activity in question have been gathered and examined, a decision should be made as soon as is reasonably practicable, what action, if any, needs to be taken and whether the individual's activities need to be restricted.
- 5.3 In evaluating the disclosure, the Appropriate Person may seek help and advice from the Dean or Director of Professional Service, and colleagues in the relevant professional areas, such as the Finance Department, Human Resources, Legal Services, Internal Audit and relevant academic staff.
- 5.4 In majority of circumstances a full prior disclosure of a potential conflict of interest, and a written record of that declaration, will be sufficient to manage the conflict situation. This is because the Appropriate Person may find out that a proposed or ongoing research or consultancy agreement and the employee's personal interests show no conflict or apparent conflict and are acceptable without further review.
- 5.5 If, however, after evaluating the disclosure, it is decided that the conflict of interest is unacceptable, a **Conflict Management Plan** should be agreed to actively manage the conflict, or if possible to avoid it. The approach adopted should be documented, signed by both the individual concerned and the Appropriate Person, and copies provided to the relevant parties (including HR to be noted on the individual's personnel file).
- 5.6 The steps agreed to manage or avoid conflict of interest should:
- 5.6.1 Specify the person, department, faculty or team which will be informed of the specific interest either by the individual concerned, or by the Appropriate Person.
  - 5.6.2 Specify any positions which the individual making the disclosure may not occupy.
  - 5.6.3 Specify any activities, including discussions, negotiations and decisions, in which the staff member making the disclosure may not participate.
  - 5.6.4 Be designed to protect the integrity and the reputation of the individual and the University.

- 5.7 A sample Conflict Management Plan template is available in the **Conflict of Interest Guidance**.
- 5.8 Depending on the seriousness of the conflict, one or more of the following management strategies could be agreed:
- 5.8.1 Standing aside from any involvement in a particular project – when no alternative can be agreed upon, this will be the solution by default, provided that it does not go beyond the scope of the individual’s contractual obligations.
  - 5.8.2 Not taking part in meetings, discussions and decision making in relation to certain matters.
  - 5.8.3 Appointment of an alternative member of staff to make decisions on specific matters.
  - 5.8.4 Modifying the project / research plan.
  - 5.8.5 Monitoring of the project / research by independent external reviewers.
  - 5.8.6 Resolving not to act as a particular person’s Supervisor or Line Manager.
  - 5.8.7 Disclosure of all pertinent information to other relevant individuals. / Publishing a notice of interest. / Declaring an interest to a particular funder, sponsor or third party.
  - 5.8.8 Divesting or placing in trust certain financial interests.
  - 5.8.9 Severance of relationships that create actual or potential conflicts - termination of involvement by others (e.g. a relative or friend) in the activity.
  - 5.8.10 Any other appropriate conflict management approach.
- 5.9 It is the responsibility of the individual affected to comply with the agreed course of action.
- 5.10 If the member of staff does not agree with the decision made by the Appropriate Person regarding how the conflict should be avoided or managed, they have the right to appeal such decision by raising the matter through the University’s [Grievance Procedures](#).

## 6. FAILURE TO COMPLY WITH THE POLICY

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- 6.1 Failure to comply with this Policy constitutes misconduct and may result in disciplinary action in line with the University’s policies and procedures.

## 7. FURTHER HELP AND GUIDANCE

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- 7.1 For further information and clarification of this Policy please refer to the **Conflict of Interest Guidance**. If in doubt help and advice is available from the [Human Resources](#) or Research Integrity and Governance Team (RIG): [researchintegrity@soton.ac.uk](mailto:researchintegrity@soton.ac.uk) .

## 8. POLICY REVIEW

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- 8.1 This Policy will be reviewed regularly in the light of any new available guidance or forthcoming legislation and at least once every three years. Information and advice will be provided to staff and students on any changes made.

## 9. RELATED POLICIES

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9.1 The University has a number of related policies and procedures which should be considered in conjunction with this Policy. These include:

- 9.1.1 [Admission Policies](#)
- 9.1.2 [Anti-corruption, Fraud and Bribery Policy](#)
- 9.1.3 [Code of Conduct for Research](#)
- 9.1.4 [Consultancy Policy](#)
- 9.1.5 [Data Protection Act](#)
- 9.1.6 [Disciplinary Procedures and Guidelines](#)
- 9.1.7 [Ethics Policy](#)
- 9.1.8 [Financial Regulations](#)
- 9.1.9 [Gift Acceptance Policy](#)
- 9.1.10 [Grievance Procedures and Guidelines](#)
- 9.1.11 [Guidelines on Consensual Relationships](#)
- 9.1.12 [Intellectual Property Regulations](#)
- 9.1.13 [Procedures for Investigating Cases of Alleged Misconduct in Research](#)
- 9.1.14 [Whistleblowing Policy](#)

## 10. VERSION CONTROL

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1.1	February 2018	RIG Team	7	Clarification of wording in section 4.1.	RIG Manager

## 11. ACKNOWLEDGEMENTS

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The University of Southampton gratefully acknowledges that the following documents were referred to when preparing this Conflict of Interest Policy:

Durham University, 2012. *Conflicts of Interest and Personal Relationships at Work*.

Imperial College London, 2015. *Conflict of Interest Policy*.

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