



CONFLICT OF INTEREST POLICY

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Introduction

1. The University is committed to ensuring that high levels of integrity apply in all areas of its operation and that all activities are conducted in an honest and transparent manner. There are some safeguards which the University is obliged to put in place to protect both an individual's and the University's reputation and to limit the risk of exposure to bribery, fraud and other malpractice as much as possible.
2. The aim of this policy is to:
 - a) enable staff, student and external members of University committees or Council, to recognise where their personal interests' conflict with, or may reasonably be perceived to conflict with, their University duties; and
 - b) set out the processes for managing conflicts of interest to ensure that business decisions are made objectively and in the best interests of the University.

What is a Conflict of Interest?

3. A conflict of interest exists when the duties owed by an individual to the University conflict with, or may possibly conflict with, a personal, financial or other interest or duty that the individual holds and/or with the interests of someone who has a close personal connection to the individual (including, but not limited to, any children, in-laws, siblings, partner or spouse). All members of staff, members of the University Council and associates of the University must act and be perceived to act impartially, and not allow other social or business relationships to influence their judgement. Links with external bodies which benefit the University are desirable but can easily give rise to perceived and apparent conflicts of interest which must then be properly managed.
4. The University encourages staff to undertake external appointments such as external or visiting examiner roles and positions with other organisations. Staff are expected to ensure these commitments do not interfere with their University role and to inform the University Secretary and/or Chief Financial Officer of such external commitments if they are concerned or unsure if there is a conflict for a decision on how the staff member should proceed.
5. The existence of a conflict of interest does not depend on whether the individual is actually influenced in their duties or decisions. It arises whenever an interest could reasonably be perceived as affecting, or having the capacity to affect, an individual's ability to make impartial decisions on the University's behalf. This means that a conflict could be perceived as arising rather than actually arising.
6. Conflicts of interest can be financial or non-financial:
 - a) Financial conflicts can arise where there is or appears to be: opportunity for personal financial gain; financial gain to someone with a close personal connection to the individual; or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions. Examples include payments, benefits in kind, equity interests, gifts, hospitality, or intellectual property rights.

- b) Non-financial interest may include any direct or indirect benefit or advantage, enhancement of an individual's career or education or gain to a connected person. Staff and other committee members should therefore consider who they are acting for, and whether there are any competing motivations or interests that could influence them or be seen to influence them.

Examples include membership of a union that is taking industrial action whilst making decisions about the implementation of mitigation of that industrial action or being a director of a company that is working with the University on a project.

A conflict may also arise where a person named on an application for research funding (or a senior member of the lead organisation who may be involved in the management of the grant) is in a position to derive personal benefit from actions or decisions made in their capacity as grant holder or has interests which might influence their objectivity in conducting the research or reporting the findings. Those benefits may not necessarily be financial.

Responsibilities

7. The governance of the University, through its committees, Academic Board, Executive Board, and Council must be conducted in accordance with this Policy. Therefore, in addition to applying to all staff, this policy also applies to student and external members of committees or Council. This Policy also applies to student and external members of University committees or equivalent bodies, such as working groups. Any reference to staff or employees will refer to all individuals working within the University at all levels and grades (whether paid or unpaid), including employees (whether permanent, fixed term or temporary), other visiting research or teaching staff, workers, trainees, seconded staff, agency staff, agents, volunteers, interns or any other person working in any context within the University.
8. Council has overall responsibility for this Policy. However, the University Secretary will oversee matters relating to conflict of interest. The Audit, Risk and Compliance Committee (ARCC) is responsible for reviewing this Policy and recommending it to Council for approval. ARCC should receive assurance about the operation of the Register of Interests from the University Secretary.
9. The Council Strategy and Governance Committee should annually review the Register of Interests for members of Council and its committees and provide the register to Council annually. Academic Board should review the Register of Interests for members of Academic Board. Executive Board should review the Register of Interests for members of the Executive Board. The University Secretary will oversee all of these Registers and report to Council, through ARCC, on the assurance in regard of the registers.
10. Should any member of University staff feel they are in a position giving rise to an actual or potential conflict of interest, they must contact the person leading the activity or transaction as a matter of urgency. They should also notify the Head of Department. Appropriate steps will then be taken to deal with the conflict of interest situation pursuant to the paragraphs below.
11. Breaches of this policy will be subject to investigation and as appropriate, action including measures in accordance with the University's Disciplinary Procedure and where breaches are considered serious, this could amount to gross misconduct resulting in disciplinary sanctions up to and including summary dismissal.

Declarations of interest

12. Where the possibility of conflicts of interests exists, it is universally accepted that prior declaration by all parties of their interests is essential. Declaring an interest is as much to protect the individual from subsequent accusation as it is to protect the University. It is not always necessary for the individual to withdraw from a connected activity, but it is important that the people with whom the individual is working understand the context to the activities and can adjust actions or decisions accordingly. There is a duty on all staff and members covered by this procedure to declare relevant interests. Staff are reminded that failure to declare a significant interest is potentially a disciplinary matter and staff are advised to declare an interest if they are in any doubt about its relevance or materiality.
13. There are three ways in which interests should be declared:
 - i. on the Register of Interests (Annual Declaration through MyView); or
 - ii. as they arise to the person leading the activity or transaction and to the Head of Department. If the matter cannot be resolved at Head of Department level, the activity or transaction should be notified to the Executive Dean/ Director of Professional Services to make a decision on how to proceed. The Chief Financial Officer or University Secretary, (as applicable, depending on whether the conflict is of a financial nature) should be notified if the matter is serious of nature or where the Executive Dean/ Director of Professional Services is unable to decide on the best course of action; or
 - iii. at the start of a Committee or Board meeting.

Declarations of interest should be a standing item at the beginning of every Committee or Board meeting, so that members and regular attendees can declare any conflicts of interest in relation to that specific agenda. The Chair will decide on the course of action for managing each conflict and report to the University Secretary of its findings. Both the declarations and any mitigating actions should be minuted. A regular attendee is a person with a standing invitation to that committee and who receives an unreserved set of papers for that particular meeting.

i. Register of Interests (Annual Declaration)

The following people are required to complete an annual declaration of interest:

- Members of Academic Board
- Members of Council and its committees
- Professional services staff on grade 10 and above*
- Members of Executive Board
- Executive Deans, Associate Pro Vice Chancellors, Pro Vice Chancellors and the Vice Chancellor*
- Directors of Professional Services*
- Members of staff with financial authority above £25,000*
- Members of Assessment Boards
- Staff applying for external research and knowledge exchange funding.

* The onus will be on individuals to send the declaration form on an annual basis before 31 August through MyView.

14. In addition, the declaration should include any comparable interest held by close family members and partners.
15. The list below provides examples of what should and should not be declared. This is not a fully comprehensive list, and for reasons of transparency, a person is encouraged to declare an interest whether it be on the list or not:
 - Directorships or trusteeships

- Unpaid/voluntary or paid work outside the University
- Property ownership where its value might be directly affected by a University decision.
- Close personal relationships with another member of staff or student where there is also a working relationship.
- Membership of a board, committee or support of another organisation where interests may conflict with those of the University or may unduly influence professional judgment.
- Membership, or being an officer of an organisation where loyalty to those members could cause a conflict or an issue to arise.
- Shares held in any company where the share value might be affected by a University decision.
- Wherever an individual is asked to provide advice on the University's activities or views as a part of external service or work.
- Any work outside the University which may significantly impact on the time needed to commit to a person's substantive role.
- Interests held by close family members and partners.

It is important to note that everyone who applies for, designs a study for or who works on projects funded by the US Public Health Service (known as 'Investigators'), and all research funded by the Public Health Service, whether awarded directly by the National Institutes of Health or indirectly, for example where Royal Holloway is a sub-awardee or sub-contractor, or by any other body of the Public Health Service must also adhere to the Financial Conflict of Interest Policy found at Appendix 2 of this Conflict of Interest Policy.

Making Your Annual Declaration

16. Further to paragraph 13 (i) this applies to:

- i) Professional services staff on grade 10 and above
- ii) Executive Deans, Associate Pro Vice Chancellors, Pro Vice Chancellors and the Vice Chancellor
- iii) Directors of Professional Services
- iv) Members of staff with financial authority above £25,000

Annual declarations should be made using the web form available on MyView.

If the declarations gives rise to a conflict of interest or potential conflict, the staff member should also notify the Head of Department or Executive Dean/ Director of Professional Services as applicable. Any conflicts (potential or otherwise) that cannot be resolved at Executive Dean/ Director level will be sent to the Chief Financial Officer and the University Secretary at conflictofinterest@rhul.ac.uk.

17. From time to time all staff and members of Council and the University Boards or Committees may find that conflicts arise because of a particular set of circumstances, for example acting as a member of a shortlisting or interview panel where a candidate is a family member or friend. Interests should be declared at the start of the Board or Committee meeting. If the matter is urgent, you should notify the Chair of the Committee/Board or the Head of Department and the person leading the activity or transaction via email. As soon as possible thereafter an online declaration form should be completed and submitted as described in paragraph 16 above. If a conflict is found to arise (actual or potential), the Chair of the Committee or Board or Head of Department will record and take any necessary action, for example, if the interest is ongoing the declaration will be included on the Register of Interests and they will make a decision on how the parties should proceed.

18. The declaration should always be submitted to the Head of Department/ Director of Professional Services/Chair of Committee or Board in every instance as they are best placed to understand how external activities overlap. The Head of Department/ Director of Professional Services or Chair will decide on whether the member of staff should continue or step away from the matter in which the conflict arises. The Register of Interests will be treated confidentially insofar as the law permits.

Submitting a Conflict of Interest

19. When an interest is declared, it is the employee's responsibility to ensure they have supplied accurate information about their role and how it relates to the potential conflict so that it can be judged whether it poses an actual or perceived conflict for the University.

The basic test is: could this conflict be justified to a sceptical member of the public?

20. If it is judged that there is no conflict, the Head of Department/Executive Dean/ Director of Professional Services/Chair will write by email to the individual acknowledging that they have declared the interest and confirming that there is no conflict and no further action need be taken. A record kept on the individual's file.
21. If the Head of Department/Executive Dean/ Director of Professional Services/Chair believes that there is a conflict of interest, they will agree with that recipient on the appropriate form of action.
22. In some situations, the appropriate action may simply be to disclose and keep a record of the declaration. In other circumstances, to ensure that decisions are made in a fair and transparent way, more active management may be required appropriate action could include:
 - a. informing other parties involved in the activity of the possible conflict.
 - b. altering the individual's role in the activity to avoid the possible conflict of interest.
 - c. advising the individual to withdraw from the activity or transaction.
 - d. not taking part in discussion of certain matters and any decisions/votes relating to those matters.
 - e. not taking part in decisions relating to certain matters, but still being present for any preceding discussion.
 - f. referring decision-making on certain matters to others.
 - g. agreeing not to act as a particular person's supervisor.
 - h. divesting or placing in trust certain financial interests.
 - i. publishing a notice of interest.

23. The Head of Department/Executive Dean/ Director of Professional Services may share the information with the Chair of Council, Executive Board, Academic Board or a University committee if the interest is relevant to the individual's membership of that board/committee (or if the individual is a regular attendee of that committee). The University Secretary or Chief Financial Officer may also be notified if the conflict is serious or potentially serious.

Summary

24. All staff must disclose conflicts of interest with their University duties to the person leading the activity or transaction as appropriate at the earliest opportunity. All declarations should be sent

to the Head of Department or Executive Dean/ Director of Professional Services irrespective of whether it is financial or not.

25. Members and regular attendees of Council, Committees or University Boards must declare annually to the Chair any personal, financial or other interests (and/or those of their close personal contacts) which constitute existing or potential conflicts with their University duties via the online declaration of interests form. They should give notice of any changes to their interests via the form at the earliest opportunity or during the next Council/Committee/Board meeting.
26. Executive Deans of School and Directors of Professional Services are responsible for ensuring that staff within their management, plus any student or external members of their institution's committees, are made aware of this Policy; ensuring that up-to-date information is supplied to the University Secretary to maintain the register of conflicts of interests and for determining how to manage each conflict.
27. Chairs of Committees or the University's Boards are responsible for asking for declarations of interest in relation to the agenda at the start of each meeting (standing order of business), determining how to manage each conflict in the context of their meeting, and ensuring that the declarations and any mitigating actions are minuted.
28. Members of Council, as trustees of an exempt Charity regulated by the Office of Students, have a legal duty to avoid conflicts of interest and to act in the best interests of the Charity. In accordance with the good practice noted in the Office of Students' Regulatory Framework, their declarations will be made publicly available on the University website.
29. The University Secretary, through their governance and compliance responsibilities will be responsible for ensuring that this Policy is maintained, that appropriate explanatory guidance is provided and for monitoring compliance with the Policy.

Policy Owner	University Secretary
Approving Body	Executive Board
Version number	3
Version 1	Approved by Council 29 June 2011
Version 2	Approved by Council 6 July 2016
Version 3	Approved by Executive Board 12 December 2023
Related policies, procedures and guidelines	
Reviewed by	R&I Secretariat Legal and Governance Human Resources
Approved on:	University Secretary confirmed no update needed 25 November 2025
Review Deadline	12 December 2027

Appendix 1

Example of the online form

Declaration of interest form		
First name:		
Surname:		
Role:		
School/Professional Service Team:		
I have read and understood the Conflict of Interest Policy:	Yes	No
Paid employment, directorship or trustee positions:		
Indicate any paid employment at the University within last 5 years (from the date of completing the form):		
Unpaid directorship or trustee positions:		
Current paid consultancies (name, scope):		
Other positions of leadership and/or control:		
Other declarations/employment:		
Other unpaid employment:		
Controlling positions held by family members:		
Any other concerns:		
Date:		

Appendix 2

Financial Conflict of Interest Policy for US Public Health Service Funded Researchers

3. Introduction & Purpose

- 1.1. Organisations in receipt of funding from US Public Health Service (PHS) funding bodies such as the National Institutes of Health (NIH), are required to demonstrate compliance with the 2011 US Department of Health and Human Services (DHHS) regulations on disclosing and reporting financial conflicts of interest, specifically Title 42 of the Code of Federal Regulations – Part 50 (Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought).
- 1.2. This policy exists to ensure the integrity of research funded by the US Public Health Service by ensuring it is free from bias resulting from an investigator's commercial conflicts of interest.
- 1.3. Furthermore, this policy establishes standards to promote objectivity and provide a reasonable expectation that the design, conduct, and reporting of research funded by the Public Health Service is not jeopardised by a financial conflict of interest.
- 1.4. This policy should be applied in conjunction with the general provisions of the University's Conflicts of Interest policy.

2. Scope

- 2.1 The policy applies to everyone at Royal Holloway who applies for, designs a study for or who works on projects funded by the Public Health Service (known as 'Investigators'), and all research funded by the Public Health Service, whether awarded directly by the National Institutes of Health or indirectly, for example where Royal Holloway is a sub-awardee or sub-contractor, or by any other body of the Public Health Service.

3. Policy Statement

- 3.1 All Public Health Service funded Investigators are required to take training on conflicts of interest
- 3.2 All such Investigators must disclose any Significant Financial Interest with respect to their Institutional Responsibilities to their Head of Department who will determine whether such interest constitutes a Financial Conflict of Interest. If the matter cannot be resolved at that level, it should be referred to the Executive Dean.
- 3.3 Where a Significant Financial Interest is determined to be a Financial Conflict of Interest, a management plan will be drawn up to help manage, reduce or eliminate the conflict. The University Secretary and the Chief Financial Officer must also be notified pursuant to the University's Conflict of Interest Policy above.
- 3.4 A disclosure of the Financial Conflict of Interest and management plan must be submitted to the Public Health Service funder.
- 3.5 Adherence to the management plan must be monitored.
- 3.6 Annual (and in some circumstances more regular) reporting of Financial Conflicts of Interest to the Public Health Service funder is required.

- 3.7 Before any expenditure of Public Health Service funds, information concerning any disclosed Significant Financial Interest which has been determined to be a Financial Conflict of Interest relating to Public Health Service funded research, must be made publicly accessible by written response within 5 working days of request.

4. Responsibilities

4.1. All Investigators

- 4.1.1. Prior to making a funding application to a US Public Health Service funder, Investigators must complete a Disclosure Form in MyView to either declare a Significant Financial Interests to their Head of Department or declare that no Significant Financial Interests exist.
- 4.1.2. The disclosure form in MyView should be completed / updated at the following time points:
No later than the point of application for funding.
Within 30 days of the issue date of each Public Health Service funded project.
Within 30 days of discovering a new financial conflict of interest.
At least annually thereafter (typically confirmed as part of the annual performance management cycle).
- 4.1.3. If a Significant Financial Interest is determined to constitute a Financial Conflict of Interest, Investigators must cooperate with their Head of Department and the Executive Dean in developing a Management Plan and comply with it.
- 4.1.4. At award stage, Investigators must undertake the online NIH Financial Conflict of Interest training and tutorial.
- 4.1.5. The training must be repeated by Investigators at least every four years, and additionally when:
- They are new to Royal Holloway
 - Changes to the Financial Conflicts of Interest Policy affect their work, or
 - If they are found to be non-compliant with Financial Conflicts of Interest Policy.
- 4.1.6. Investigators must send a copy of the certificate of training to researchcompliance@rhul.ac.uk.
- 4.1.7. Investigators must be familiar with Royal Holloway's Conflicts of Interest Policy

4.2. Principal Investigators

- 4.2.1. Principal Investigators, in addition to the provisions described for All Investigators, are responsible for ensuring that all members of their research team meet their responsibilities as described above.

4.3. Heads of Department

- 4.3.1. The Head of Department must review all Significant Financial Interests disclosed by Investigators to determine whether any are related to research funded through a U.S. Public Health Service funder and if so, whether they constitute a Financial Conflict of Interest.

4.3.2. If a Significant Financial Interest is determined to be a Financial Conflict of Interest, the Head of Department must notify researchcompliance@rhul.ac.uk and the Chief Financial Officer as soon as it is disclosed / identified.

4.3.3. With support from Research & Innovation, the Head of Department and Chief Financial Officer will set out a plan to manage, reduce or eliminate the conflict. At a minimum, the management plan must include information on the role and principal duties of the conflicted Investigator in the research project, conditions of the management plan, how the management plan is designed to safeguard objectivity in the research project, confirmation of the Investigator's agreement to the management plan and how the management plan will be monitored to ensure Investigator compliance.

4.3.4. The Head of Department will monitor adherence to the plan and if non-compliance is found then will conduct, in conjunction with the Head of Policy & Integrity, a retrospective review of the Investigator's activities and the Public Health Service funded project within 120 days to determine whether any of the research was biased in design, conduct or reporting. The funder has sanctions up to and including withdrawal of all funding in such circumstances.

4.4. Research & Innovation

4.4.1. Research and Innovation will submit to the National Institutes of Health the required initial, ongoing and annual Financial Conflict of Interest reports throughout the duration of relevant funded projects via the eRA commons link.

4.4.2. Research and Innovation will report information on identified Significant Financial Interests and how they are being managed to the funder.

4.4.3. Research and Innovation will coordinate with the University Secretary to make information accessible to the public concerning identified Significant Financial Interests held by senior or key personnel insofar as it may be relevant to the requirements of Public Health Service funders.

4.4.4. Research and Innovation will support Heads of Department in preparation of management plans.

4.4.5. Research and Innovation will provide guidance and advice to Investigators and relevant Heads of Department in respect of Public Health Service funded research and compliance requirements.

4.5. Legal and Compliance

4.5.1. The University Secretary has the functional responsibility for maintaining the University's framework for the declaration of interests and the management of potential conflicts of interest, including the Royal Holloway Conflicts of Interest Policy and the supporting mechanisms such as annual declarations through MyView.

5. **Related Documents**

- Royal Holloway Conflicts of Interest Policy
- Royal Holloway Code of Good Practice in Research
- NIH Financial Conflict of Interest Policy (<https://grants.nih.gov/grants/policy/coi/index.htm>)

6. **Monitoring and Compliance**

(TBC Once Royal Holloway Conflicts of Interest Policy is updated)

7. Statutory Definitions set out in the US Code of Federal Regulations

- 7.1. **Investigator** is defined as the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the Public Health Service, or proposed for such funding, which may include, for example, collaborators or consultants. To ensure personnel are correctly identified for the purpose of policy compliance, consider the role of those involved rather than their title and the degree of independence with which they work.
- 7.2. **Institutional Responsibilities** are defined as an Investigator's professional responsibilities on behalf of the institution, e.g. research, research consultancy, teaching, professional practice, University committee memberships, service on panels such as ethical review boards.
- 7.3. A **Financial Conflict of Interest** exists when the institution, through its Designated Official (see below) reasonably determines that an Investigator's Significant Financial Interest is related to a Public Health Service funded research project and could directly and significantly affect the design, conduct or reporting of the Public Health Service funded research.
- 7.4. A **Significant Financial Interest** is a financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's Institutional Responsibilities:
 - (i) With regard to any publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g. consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
 - (ii) With regard to any non-publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g. stock, stock option, or other ownership interest); or
 - (iii) Intellectual property rights and interests (e.g. patents, copyrights), upon receipt of income related to such rights and interests.

The term *significant financial interest* does not include the following types of financial interests:

- (i) Salary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights;
- (ii) Any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization;

(iii) Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical centre, or a research institute that is affiliated with an Institution of higher education; or

(iv) Income from service on advisory committees or review panels for a federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical centre, or a research institute that is affiliated with an Institution of higher education

8. Document Control Information

Policy Owner		Director of Research & Innovation
Operational Owner		Head of Policy & Integrity
Approving Body		
Date of Approval		
Reviewed By		Research & Knowledge Exchange Committee
Approved by Research & Knowledge Exchange Committee		
Approved by Academic Board		
Deadline for Review by Council		
Version History		
Version (Newest to Oldest)	Date of approval	Summary of changes
1		