



Disclosure of Conflicts and Declarations of Interests Frequently asked Questions (FAQs)

1. What are examples of Conflicts of Interests?

Broadly speaking, a conflict can occur when your personal interests, personal relationships or duties to others compete with your obligations to UCL (as a member of staff or student). This can include situations where your UCL obligations are likely to be compromised, or may appear to be compromised, by personal gain, or gain to your immediate family (or people you have a close personal relationship with).

Conflicts of interest may be financial or non-financial or both.

Financial interest refers to anything of non-trivial monetary value, including pay, commission, consultancy fees, equity interests, forgiveness of debt, property, royalties, and intellectual property rights.

Non-financial interest refers to any non-financial benefit or advantage, including enhancement of an individual's career, education or professional reputation; access to privileged information or facilities.

Potential conflicts could arise through your involvement in:

- Executive and Non-Executive Directorships, appointments and ancillary employment in other enterprises
- Partnerships
- Consultancy arrangements
- Research activities where the PI has a relationship with the funding body
- Investments
- Shareholdings (including spin out companies)
- Trusts/nominee companies
- Real estate/immovable property
- Other assets
- Other significant sources of income
- Reportable gifts (including substantial travel, hospitality or other forms of valuable benefit)
- Liabilities
- Other personal interests which could constitute a potential conflict of interest situation

This list is not exhaustive, and other situations could constitute potential conflicts

2. What is not a Conflict of Interest?

Any aspect of your personal and professional identity, including personal belief and internal interests (education, profession, reputation, career advancement) are not considered conflicts of interest.

3. What does relevant staff mean?

Relevant staff means all staff working at UCL including honorary and emeritus staff, visiting staff, contractors and consultants, and staff and directors of UCL's subsidiary companies.

4. What does relevant students mean?

Relevant students means all individuals who are undertaking work and training towards a doctorate and who are registered with UCL, via Student and Registry Services, for their degree.

5. How do I Disclose a Conflict of Interest?

Staff and should make a conflict of interest disclosure as soon as there is a risk that a conflict or potential conflict might arise – essentially as soon as you recognise that a potential conflict might be perceived. Disclosure should be made via the Conflicts and Interests Register.

The same applies to relevant Students, who should make disclosures via the [for discussion, system to be agreed]

6. How does a subsidiary company of UCL manage the implementation and compliance with the Policy? This is in the context that the subsidiary is not the reviewer, or the approver.

The board of directors of each subsidiary company of UCL is responsible for ensuring the implementation of and compliance with this Policy by staff and students working at the relevant subsidiary company. Such boards of directors will ensure that staff and students working at the relevant subsidiary company are made aware of this Policy and related guidance.

7. How can I see if someone has already declared an interest I am aware of?

Persons with grounds to inspect declarations of interest shall be allowed access to the relevant data at the discretion of the Chief Operating Officer.

8. How will conflicts of interests be managed?

In the first instance via a Conflict Management Plan: the management plan that sets out the agreed strategy for managing a disclosed conflict. The Conflict Management Plan might include the review dates, responsibilities of discloser, reviewer and others, and identify any options for amendment that may be required in the future. There are several strategies that may be appropriate to a Disclosed Conflicts Management Plan, such as (but not limited to):

- not taking part in discussions of certain matters;
- not taking part in decisions in relation to certain matters;
- referring to others certain matters for decision;
- resolving not to act as a particular person's supervisor;
- divesting or placing in trust certain financial interests;
- publishing a notice of interest;
- standing aside from any involvement in a particular project; and/or
- declaring an interest to a sponsor or third party.

9. How do we develop a conflict management plan and who needs to approve it?

This should be developed by the Reviewer and the Discloser. Once it has been agreed, the relevant Conflict Management Plan will need to be approved by the Approver.

10. Where can we get specific advice?

Guidance on developing a Conflict Management Plan can be sought at any time from the relevant Vice-Provost and, if necessary, a Conflict of Interest Committee can be convened by the Provost.

11. How do we ensure new staff, new students and existing staff are aware of the Policy and are compliant?

For new relevant staff and relevant students, training will be a component of the induction process. An appropriate programme of training will be developed for existing relevant staff and relevant students. Heads of Department and other managers will be provided with appropriate training to support their roles and responsibilities.

The Chief Operating Officer is accountable for ensuring that a system exists and is maintained with the purpose of holding details of disclosed conflicts, and declared interests. This system is the Conflicts and Interests Register.

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