

Examples of Conflicts of Interest

Appendix I UPR GV17 version 02.0

Policies superseded by this document

This document replaces version 01.0 of UPR GV17 Appendix I with effect from 1 September 2023.

Summary of significant changes to the previous version

Minor amendments to examples of non-financial conflicts of interest, in relation to conflicts of academic independence, and in the specific area of apprenticeships to engage external examiners/assessors or independent assessors to carry out end point assessments (See sections 3.1, 3.3, 3.4 and 3.5).

Glossary

A glossary of approved University terminology can be found in [UPR GV08](#).

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1 Examples of financial conflicts of interest (personal)

The following are (non-exclusive) examples of where a financial conflict of interest may arise:

- A member of staff or their immediate family or someone with whom they are in a close personal relationship is a director or shareholder of a company that offers services to, or competes with, the University.
- A member of staff is offered a gift by a collaborative partner when contracts are still under negotiation.
- A member of staff holds shares in a company which contracts with the University.
- A member of staff receives payment in relation to intellectual property owned by the University.
- A researcher has a financial interest in a company sponsoring their research.

- A researcher conducts a clinical trial which is sponsored by a person or organisation with a financial interest in the results.
- A member of staff has an interest (e.g. shares or an appointment) in a company to which the University has licensed intellectual property rights.
- A postgraduate research student receives support from a company in which their academic supervisor has a financial interest or position.
- A member of staff is in a position to judge the quality of a student's work (for example, in a competition or in relation to the award of prizes or scholarships) and also has a financial stake or position within any commercial venture in which that student is involved.
- A staff member takes part in the negotiation of a contract between the University and a company in which the staff member or a member of their family or someone with whom they have a close personal relationship has an interest (financial or otherwise). External entities (such as research councils or other funding bodies) often require that staff declare any interests as part of the tender process and, where appropriate, the University may also require such additional declarations. Authors submitting articles may also be required to declare any financial interests relating to the manufacturers or providers of services that relate to the research discussed.

2 Examples of financial conflicts of interest (institutional)

2.1 The following are (non-exclusive) examples of where a financial conflict of interest may arise for the University:

- The University is part of the same group as an existing or proposed Partner organisation and the University is considering entering into some form of new or additional collaboration or partnership with that organisation.
- The University is part of the same group as an existing or proposed Partner organisation and the University is considering sub-contracting the delivery of one or more of its programmes to that organisation or changing any existing sub-contracting arrangements.
- The University is considering awarding a grant of money or prize to an organisation in which it already holds an interest (e.g. a shareholding).

2.2 A conflict of interest may arise when the University will benefit financially from an existing or proposed partnership, collaboration or sub-contracting arrangement with an existing or proposed Partner organisation.

3 Examples of non-financial conflicts of interest (personal and institutional)

3.1 Non-financial conflicts of interest include (but are not limited) to the following types of conflict:

- Conflicts of **commitment and loyalty** – where the external activities of a member of staff interfere with their responsibilities to the University;
- Conflicts of **research integrity** – where a staff member's integrity is jeopardised by the potential for personal gain from that research;
- Conflicts of **educational mission** – where the direction of a student's research is influenced by a member of staff's external interests;
- Conflicts of **academic independence** – where external examiners or independent assessors have been involved in any on-programme training, line management, on programme assessment or have any personal, professional or commercial connection with the students undertaking assessments, including apprentices undertaking End Point Assessments;
- **Internal conflicts of interest** – where different research groups within the University work on projects with conflicting objectives (e.g. where the respective sponsors are in competition; or the sponsors have conflicting objectives such as cancer research and promotion of the tobacco industry); and
- Conflicts of interest in relation to **personal relationships at work** – where a member of staff may have the ability to influence decision-making as a result of a personal or family or close personal relationship (or past relationship) with another member of staff or student. Staff and students should refer to UPR TL02 'Personal Relationships between Staff and Students' for details of the University's policy regarding such relationships.

3.2 The following are (non-exclusive) examples of where a non-financial conflict of interest may arise:

- Participating in the appointment, hiring, supervision or evaluation of a person with whom the staff member has a family or close personal relationship.
- A staff member is a director of a University subsidiary company and also sits on a University committee which makes decisions in relation to that subsidiary company.
- A staff member is a director or member of the senior personnel of an existing or proposed Partner organisation.
- A staff member is a trustee of a charitable organisation which proposes to sponsor University research and also holds a position in the University where their team may benefit from such sponsorship.
- A staff member is married to another member of staff and in a position to decide about funding for their project.

- A staff member has limited time to spend on University work due to their commitment to outside interests.
 - A research group accepts funding from a company which manufactures and deals in armaments when the University has made a commitment elsewhere not to work with the arms industry.
 - Where a person making a decision stands to gain (or their immediate family or a close personal acquaintance stands to gain) from that decision.
 - Where the University is delivering an apprenticeship with an integrated End-Point Assessment and the same person acts as an apprentice's Internal Assessor for the End-Point Assessment in circumstances where they have also taught that apprentice on the programme.
- 3.3 In the specific area of apprenticeships, the University engages external examiners/assessors to undertake assessments and is an End Point Assessment Organisation (EPAO) for integrated End Point Assessments as part of its Apprenticeship delivery. In both cases, the external examiners/assessors and independent assessors recruited to undertake the assessments must be free from any conflicts of interest that could adversely affect their objectivity or judgement in administering and undertaking the assessments in a robust and consistent manner.
- 3.4 Wherever an external examiner/assessor or independent assessor is engaged (and in the case of independent assessors engaged to carry out End Point Assessments, on an annual basis), there should be an assessment of any conflicts, or perceived or potential conflicts, of interest in relation to the proposed assessments.
- 3.5 The following are (non-exclusive) examples of where a non-financial conflict of interest may arise in the context of an apprenticeship:
- In relation to the University delivering an apprenticeship with an integrated End Point Assessment where:
 - The same person acts as an apprentice's independent assessor for the End Point Assessment in circumstances where they have also taught that apprentice on the programme;
 - An independent assessor and the apprentice have previously been, or are currently, employed by the same employer;
 - The independent assessor has a close professional, contractual or personal relationship with a member of staff or apprentice involved with the training programme or close connections to the employer; or
 - The independent assessor has previously been involved in either the on or off the job delivery of the training programme.

- 3.6 If a member of the University or a member of their immediate family is a **politically exposed person** (or **PEP**¹), this can also give rise to a conflict of interest (or be deemed to do so). Such circumstance should always be disclosed.

Sharon Harrison-Barker
Secretary and Registrar
Signed: **1 August 2023**

Alternative format

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¹

A politically exposed person (PEP) is defined as an individual who is or has been entrusted with a prominent public function (e.g. in central government or a court of law) either in the UK or overseas. Due to their position and influence, it is recognised that many PEPs are in positions that potentially can be abused for the purpose of committing money laundering (ML) offences and related predicate offences, including corruption and bribery.