

Conflict of Interest Policy

DOCUMENT CONTROL INFORMATION			
Document type	POL (Policy)	Full Document Number	<i>RMSPOL002</i>
Version:	1.3	Superseded Version:	1.2
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Department / Function:	RMS (Research Management Services)	Subject category:	Business Practices
Authorship date:	31-03-2016	Published date:	26-10-2020
Management Committee sign off date:	21-10-2020	Date for Review:	October 2021
Signature (optional):		Frequency of review:	1 year
Date of Equality Assessment “due regard” form (Equality Act 2010):	30-04-2018	Equality Assessment reference number:	EIA – 25410

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1 Introduction and Context

- 1.1 LSTM is committed to the highest standards of ethical conduct and integrity in all its activities both in the UK and overseas. This policy sets out LSTM's position on conflict of interest to ensure the ethical principles that guide its research and related activities are upheld and the integrity of its staff is maintained.
- 1.2 This policy provides guidance on recognising and managing conflicts of interest and wherever possible preventing them occurring. Procedures for reporting conflict of interest are also detailed in Section 6 with forms provided in Section 9 (staff) and Section 10 (suppliers).
- 1.3 This policy should be read in conjunction with other related LSTM policies:
 - Whistleblowing Policy
 - Fraud, Bribery and Corruption Policy (including tax evasion and money laundering)
 - Handling Allegations of Research Misconduct
 - Academic Research Performance Standards and Management
 - Financial Regulations; Section 4.5
 - Human Resource Policies
 - Safeguarding Policy
 - Protecting Children and Vulnerable Adults Policy and Procedure

2 Policy Statement

- 1.1 LSTM is a major research organisation with global reach and influence and its staff are actively encouraged to participate in external activities that enhance their professional skills or contribute to public service.
- 1.2 This policy and associated form apply to:
 - All employees, officers, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of LSTM in the UK and overseas. This includes short term consultancy teaching contracts (for LSTM) even if that teaching is being delivered in another institution.
 - Employees of partner institutions who are delivering LSTM grant/contract awards under a sub contract, collaboration or other agreement.
 - This policy also applies to students when they are acting on behalf of LSTM, either paid or voluntary.
- 1.3 All LSTM staff and associated persons are required to recognise and disclose activities that might give rise to conflicts of interest or the perception of conflicts of interest and to ensure that such conflicts are seen to be properly managed or avoided.

3 Recognising conflict of interest

- 3.1 A conflict of interest refers especially to situations in which financial or other personal considerations may compromise, or may have the appearance of compromising an employee's professional judgement in conducting or reporting research or teaching or in selecting a supplier or partner to work with.
- 3.1 Such conflicts of interest can affect the collection, analysis and interpretation of data, recruitment of staff, procurement of goods and services, sharing of results and the use of statistical methods.
- 3.2 Many employees either have positions that allow them to influence decisions made by the organisation, or they have been entrusted with the authority to make decisions on behalf of the organisation. A conflict of interest exists if an employee influences or makes a decision that could lead to any form of financial or personal gain for that employee or for his or her family.
- 3.3 Situations can be presented in which the appearance of conflict of interest is present even when no conflict actually exists, therefore it is important for all staff and students, when evaluating a potential conflict, that consideration is given to how it might be perceived by others.
- 3.4 The duty to declare a possible conflict applies to the perception of the situation rather than the actual existence of a conflict. Even if the situation cannot reasonably be regarded as likely to give rise to a conflict of interest, this does not reduce or diminish the duty to declare it.
- 3.5 Conflicts of interest may be financial or non-financial or both.

4 Conflict of Interest in the internal environment

- 4.1 Periodically, LSTM conducts a number of competitive calls such as Confidence in Concept, Proximity to Discovery, Director's Catalyst Fund. Mock exercises/events are also conducted across its academic departments to assess and improve the quality of publications and other research outputs aimed at maintaining standards and LSTM's reputation in research excellence, as well as preparing for the Research Excellence Framework (REF). It may also be necessary to conduct an internal selection process for funding schemes where there are limits on the number of applications submitted by an institution.
- 4.2 LSTM recognises the importance of managing all real, potential or apparent conflicts of interest throughout these calls/exercises/events with integrity, impartiality, honesty and openness. The credibility of these calls/exercises/events relies on the transparency of the decision making forum.
- 4.3 LSTM will ensure that within each of these calls/exercises/events, appropriate measures are in place to manage potential conflict of interest. Each call/exercise/event will publish how decisions/judgements are made and by who. The standard operating procedures for each call/exercise/event will highlight what potential conflicts may arise, and how this will be managed.

5 Conflict of Interest in the external environment

- 5.1 The LSTM Procurement team will periodically invite external suppliers to quote or tender for LSTM Group business. LSTM could not conduct their business without the support of the LSTM external supply chain and as such the same principles of integrity, impartiality, honesty and openness apply throughout the procurement process.
- 5.2 LSTM will ensure that throughout the Procurement process, appropriate measures are in place to manage potential or perceived conflicts of interest.
- 5.3 Following a tender process a report will be produced detailing the decisions made, the rationale behind the decision making, all individuals involved in the selection and how any potential conflicts of interest were recorded and managed.

6 Reporting

- 6.1 In accordance with LSTM Financial Regulations, LSTM Board Members, Committee Members and Senior Managers (defined as members of Management Committee or Head of a Research Group) are required to complete and sign a declaration each year to certify that they have not derived any personal profit or gain, directly or indirectly, by reason of his or her participation with the LSTM Group of companies.
- 6.2 In addition to the above requirements, an email will be circulated to all staff by the Head of Research Management in September/October of each year as a reminder that they need to consider making a declaration if they feel they may have a conflict of interest.
- 6.3 In line with funder terms and conditions, it is now a requirement for staff to be explicit in a nil return. A date will be given as part of the reminder email and if staff have not responded by that prescribed date, they will be deemed as having no conflict of interest to declare.
- 6.4 For consultants engaged in teaching activities, a form will be included with their contracting documentation which must be completed prior to their engagement.
- 6.5 New suppliers to LSTM will be required to complete a Declaration of Interest form (Section 10) prior to being added to the LSTM Finance system.
- 6.6 Staff involved in the tendering process will be required to submit a Declaration of Interest form (Section 9) prior to the commencement of the tender.
- 6.7 All employees should report any potential conflict of interest to his/her line manager/head of department using the template form in Section 9 to this policy. The head of department will evaluate the information and if it is considered that the proposed activity shows no apparent conflict, then no further action will be required.
- 6.8 If the head of department concludes that there are questions of propriety, then he/she will refer the matter to the Director of Strategic Operations for review by LSTM's Senior Management Group who will decide on a further course of action.
- 6.9 The register of declared conflicts of Interest are retained as follows:

- LSTM Board Members, Committee Members and Senior Managers in accordance with Financial Regulations: retained by Director of Strategic Operations
- Those which have been reviewed by the Senior Management Group: retained by Research Management Services.
- Those forms completed by consultants engaged in teaching activities: retained by Dean of Education's Office
- Forms completed by staff engaged in the tender process for goods and services; retained by Procurement team.

7 Breaching the Policy

7.1 Any allegation that an employee has acted in a manner that is inconsistent with this policy and its associated procedures is likely to constitute a disciplinary matter for the individual concerned and may cause serious damage to the reputation and standing of LSTM. Staff are therefore advised to declare any potential conflict even if they are in doubt about its relevance or materiality.

8 Equality, Diversity and Safeguarding

8.1 LSTM is committed to promoting equality of opportunity, combatting unlawful discrimination and promoting good community relations. We will not tolerate any form of unlawful discrimination or behaviour that undermines this commitment and is contrary to our equality policy.

8.2 In line with our Safeguarding policy and procedures, LSTM's recruitment process reflects our organisational commitment to keeping children and vulnerable adults safe. As part of our recruitment process, we will:

- assess jobs to identify those that have contact with children and vulnerable adults
- include a standard statement on all job adverts
- ensure that appropriate selection measures and pre-employment checks are carried out
- ensure that when taking up references from previous employers, ask about the candidates experience and suitability to work with children and/or vulnerable adults (where applicable)
- ensure that staff receive, read and sign a copy of our code of conduct at the time of signing their employment contract

9 Conflict of Interest Disclosure form - Staff

The following report should be completed by LSTM employees who suspect they have a potential conflict of interest. It should be submitted to the Head of Department.

Name	
LSTM Group/Dept	
Date of report	
Nature of the activity: Please provide as much information about the activity in which you think there's a potential conflict of interest.	
Description of the parties involved: Please provide as much information about the people involved and any affiliations that you know of.	
Details of any financial incentive/reward	

10 Declaration of Interest Disclosure form – Suppliers

DECLARATION OF INTEREST BY CONTRACTORS, CONSULTANTS AND SUPPLIERS



Policy Statement

In line with the Liverpool School of Tropical Medicine’s core procurement values of fairness and equality, it is a requirement that no-one should gain undue benefit or advantage through working for LSTM or its subsidiaries, consultants and suppliers. Neither Board members, staff, contractors, consultants nor suppliers are permitted to use their position to bring benefit or advantage to their relatives, associates or businesses in which they have an interest.

We ask contractors, consultants and suppliers to declare whether members of their staff who are involved with the proposal for and provision of goods or services to LSTM, have any association to a current member of LSTM staff that may result in the appearance of compromising fairness and equality within this procurement.

The Procurement Team keeps the return of these forms which are available for scrutiny where appropriate.

Schedule 1 - Declaration of Interest Form.

1. Have you, or any member of your staff involved in this purchase, been directly employed by LSTM in the last twelve months, (do not include employment via works orders or other approved works)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide details:	
2. Are you, or any member of your staff involved in this purchase, related* to an employee of LSTM, or an LSTM Board of Trustee member?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide details:	
3. Do you, or any member of your staff involved in this purchase, have any managerial or financial interests in any other commercial business which is associated directly with LSTM?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide details:	

Please notify us of any changes in these details. Failure to inform LSTM of any changes may result in termination of the current contract.

** Related” is classed as being someone who is related by blood or marriage or, who is so close to a member of staff employed by LSTM that there is a real risk that a decision to grant them payment could be influenced by that relationship. It will normally include a person’s spouse, parent, grandparent, child, grandchild, (including a child or grandchild born outside of marriage), and brother and sister. A cohabiting relationship should be treated as marriage for this declaration.

FORM OF UNDERTAKING

I confirm that the answers and details above are correct and true to the best of my knowledge. I further agree to write to the Procurement Team if my circumstances change and my declaration of interest needs amending.

Company Name:			
Signed:		Name:	
Position:		Date:	