

University College Cork – National University of Ireland, Cork

Conflict of Interest Policy Version 2 2025

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Conflict of Interest Policy, Version 2, 2025

1. Introduction

The University recognises that its Staff have diverse interests and contacts within the national and international community. It considers that links between its staff and outside bodies are generally in the University's interest. However, it also recognises that it is possible such connections may give rise to potential Conflicts of Interest.

The University appreciates that, in general, Staff will recognise Conflicts of Interest and will want to ensure that there can be no perception of wrongdoing and that they are personally above reproach. It also appreciates that, in most cases, Conflicts of Interest will be easily managed and that declaration of the Conflict of Interest is all that is needed.

Conflicts of Interest can and will arise. The important thing is to ensure they are managed appropriately. In the vast majority of cases simple disclosure of potentially conflicting activities is sufficient. Occasionally UCC may suggest a different way of managing an activity that avoids the Conflict of Interest. In extreme cases, the Conflict of Interest may be so fundamental that it is unmanageable and it therefore becomes necessary to restrict one or other of the Staff's conflicting activities.

2. Purpose

The purposes of this Policy are to:

- 1. present a definition of Conflict of Interest;
- 2. assist Staff in identifying Conflicts of Interest;
- 3. set out examples of situations where potential Conflict of Interest may arise;
- 4. set out the process for the disclosure of Conflicts of Interest;
- 5. provide guidance to those responsible for managing Conflicts of Interest; and
- 6. assist in the management of Conflicts of Interest in order to protect the University and its Staff.

3. Scope

This Policy applies to all University Staff, Members and committees and all others who work in the University, in any capacity (for example: retired staff who are still conducting research, teaching and working in the University, third party contractors, students involved in research, those who hold a UCC Honorary title).

It should be noted that every reference to "Staff" contained in this Policy shall include all persons referenced in the definitions section of the Policy and any other individual provided for within the Policy Scope as set out in this section.

This Policy relates to any Conflict of Interest arising in connection with any University activity

4. Definitions

For the purposes of this Policy, the following <u>capitalised terms</u> (which are used throughout this Policy) shall have the following meanings in the context of this Policy:

Table 1: Policy definitions

Term	Definition
Policy	This Conflict of Interest Policy
Conflict(s) of Interest	A situation in which someone's personal interests, obligations or loyalties could influence, or be seen to influence, the objective performance of their official University duties and responsibilities. This personal interest can be direct or indirect, and it can include the interests of parties connected to them (see definition of connected person below). For the purpose of this Policy every reference to Conflict of Interest shall include actual, potential or perceived conflicts of interest.
Connected Person	 A connected person includes: a relation such as someone's child, step-child, parent, grandchild, grandparent, brother or sister; someone's spouse/civil partner or the spouse/civil partner of any person listed above; a friend, close acquaintance/ or in a close relationship; a person carrying on business in partnership with them or with any person listed above; an institution which is controlled by them or by any person listed above a body corporate in which they or any person, listed in any of the first 4 points above, has a substantial interest; a person that is a collaborator in a current project or work activity, where currency can be taken to span the preceding six years.
Connected Persons for selection committee/ promotions board members	 Conflict of Interest will be deemed to exist for a selection committee/promotions board member in the following circumstances: The selection committee/promotions board member is a collaborator with an applicant in a current project or work activity; The selection committee/promotions board member has supervised or is supervising an applicant when They were a post graduate student; The selection committee/promotions board member is related to the applicant (i.e. spouse, parent, child, sibling, uncle or aunt, first cousin, niece or nephew, fiancée or grandparent or grandchild) has or has had a personal relationship with an applicant; The selection committee/promotions board member has a family or social connection with the applicant, for example the applicant is a neighbour, or their children go to school together etc;

	 The selection committee/promotions board member has been named as a referee by a candidate; Any other reason as considered relevant by the selection committee/promotions board member. 			
COI Reviewer	The appropriate persons(s) for assessing, adjudicating and resolving matters pertaining to Conflicts of Interest. It is important that the COI Reviewer does not have a Conflict of Interest in relation to the matter.			
Staff	Reviewer does not have a Conflict of Interest in relation to the matter. For the purpose of this policy shall mean all full-time, part-time, fixed term employees of the University, agency workers, any person to whom the definition of researcher (as defined in the Code of Research Conduct) applies, students involved in research and any other person in receipt of payment from the University including those persons who may also be students of the University. For the avoidance of doubt payment includes but is not limited to: external research grants; scholarships or any other form of third party funding.			
Member	Any Governing Authority member or committee member who is not Staff			
OCLA	Office of Corporate and Legal Affairs			
University or UCC	University College Cork – National University of Ireland, Cork			

5. Policy Statement

The fundamental principle of this Policy is that Staff should always declare an activity if they are in doubt whether it represents a Conflict of Interest.

The four key steps in dealing with a Conflict of Interest are:

Figure 1: Summary of four key steps in dealing with a Conflict of Interest



5.1 Identifying a Conflict of Interest

To identify a Conflict of Interest, all Staff must understand what constitutes a Conflict of Interest.

5.1.1 What is a Conflict of Interest

Actual: You have a direct conflict between your official duties and University responsibilities and a competing interest or loyalty, whether personal or involving a Connected Person.

Perceived: It could reasonably be perceived, or give the appearance, that a competing interest could improperly influence the performance of your official duties and University responsibilities.

Potential: A situation which could develop into an actual or perceived conflict of interest.

A Conflict of Interest arises when someone's personal interests or loyalties could influence, or be seen to influence, the objective performance of their official University duties. The personal interest could be direct or indirect and includes the interests of a Connected Person.

A Conflict of Interest may arise where an individual might be seen to be influencing University matters for actual or potential personal benefit. Such a conflict may arise in a situation when a member of Staff is in a position to influence, directly or indirectly, University business, research or other decisions in ways that could lead to personal gain or gain for Connected Persons.

When trying to identify whether there is a Conflict of Interest, consider whether a reasonable person would think your interests and loyalties, including those of a Connected Person, could conflict or appear to conflict with your University duties. Ask yourself:

- Would I be happy if a colleague became aware of my involvement?
- Would I be happy if my involvement appeared in the media?
- If I saw someone else doing this, would I suspect that they might have a Conflict of Interest?

Staff should not be involved in making decisions in relation to their commitments to the University from which they, or any Connected Person, may stand to benefit. Such considerations apply to a wide range of activities in which conflicts may arise, including, but not limited to:

- student admissions;
- student assessment;
- disciplinary proceedings;
- appeals;

- drafting documentation for a job posting;
- assessment of candidates for selection or promotion;
- fee concessions;
- procurement;
- research;
- · contractual arrangements;
- consultancy;
- licensing intellectual property;
- assessing proposed relationships between the University and outside parties including University Spin Out Companies;
- commencement or development of a University Spin Out Company.

Any commitments outside of the University should be subject always to the approval of the appropriate person in accordance with the University Consultancy Policy. If there is an actual or potential risk of a perceived conflict arising from such outside interests, this should be disclosed in accordance with the terms of this Policy.

5.1.2 Examples of Conflict of Interest

It is impossible to list all possible Conflict of Interests as circumstances and relationships vary so widely. The following, non-exhaustive list, may be considered as examples of Conflicts of Interest:

- a Staff member is in a position to exert influence on decisions relating to the University in ways that could lead to personal gain or give undue advantage to them or a Connected Person;
- a Staff member has one or more personal interests outside the University which could compromise, or have the appearance of compromising, the Staff member's professional judgement in particular instances within research, administration, management, teaching or other professional activities;
- a Staff member, directly or indirectly, has a personal interest in the outcome of deliberations of a Board or Committee or other such structure, in a contract or proposed contract to be entered into by the University or a University-related body, or is likely to gain personally as a result of a decision made by the University or a University-related body;
- a Staff member has any involvement in a company, body or affiliation whether public or private in nature, whose interests may be in competition and/or conflict with those of the University;
- a Staff member accepts gifts, gratuities or favours from any third party engaged in or wishing to engage in transactions with the University, except in the case of customary gifts of a nominal value (i.e. gifts with a combined value of no more than €650 per annum as per Ethics in Public Office Acts 1995 and 2001).

Practical examples of potential Conflict of Interest scenarios as they may arise in the University setting are contained at **Appendix 1**. These are purely for illustrative purposes.

It is important that in each instance the individual concerned should consider the perspective of an independent external observer and assess if such an observer would perceive there to be a Conflict of Interest.

In relation to extracurricular commitments that may create conflict, members of Staff should also ensure that they do not enter commitments or engage in activities which are inconsistent with their contracts of employment, with regard to outside activities and the permission required to engage with them. It should be noted that such restrictions may, in some cases, survive the termination of a member of Staff's employment and as such this Policy is applicable in those circumstances.

5.2 Declaring a Conflict of Interest

Conflicts of Interest should be declared promptly and fully. In most cases, potential Conflicts of Interest will be easily managed and declaration of the Conflict of Interest is all that is needed. Disclosure should be made when:

- the Conflict of Interest first arises;
- it is recognised that a Conflict of Interest might be perceived; or
- it is recognised that there is the potential for a Conflict of Interest.

This disclosure should be set out in the form contained at **Appendix 2** to this Policy. The person to whom the disclosure should be made, depending on the circumstances, is set out in **Appendix 3**. Staff members are required to make the disclosure to the first channel unless the disclosure relates or involves the person to whom otherwise the disclosure would be made. Thereafter channels should be utilised sequentially.

The person to whom the disclosure has been made, within the framework set out at **Appendix 3**, shall become the COI Reviewer for the purpose of determining the appropriate next steps to be taken in relation to a Conflict of Interest.

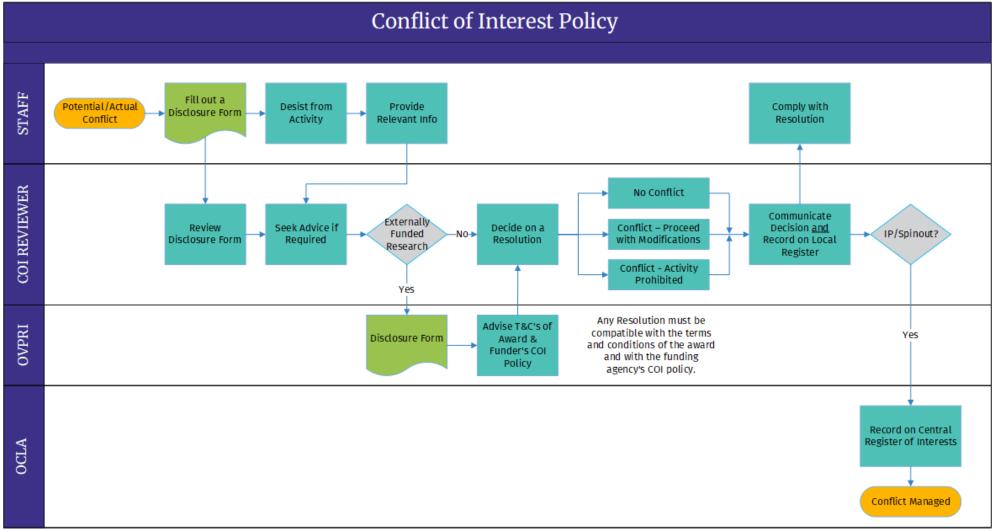
The COI Reviewer can take advice on the issue from colleagues in the relevant professional areas, as appropriate (for example: research, consultancy or an issue pertaining to intellectual property to the Vice Principal for Research and Innovation or a procurement issue to the Chief Financial and Operating Officer).

In exceptional circumstances, where it is determined that the COI Reviewer is unable to deal with or resolve the Conflict of Interest (e.g. where the COI Reviewer may also be subject to the same Conflict of Interest) then the matter should be referred to an appropriate person (as determined and approved by Corporate Secretary or their nominee) who will then become the COI Reviewer.

If a Conflict of Interest is disclosed to a person other than those persons set out in **Appendix 3** then the recipient of the disclosure shall refer the matter to the Corporate Secretary who shall redirect the matter in line with **Appendix 3**.

Figure 2 sets out the process for managing a Conflict of Interest in line with this policy.

Figure 2: Process Chart for Managing a Conflict of Interest



5.3 Managing a Conflict of Interest

Once a Conflict of Interest has been disclosed, the COI Reviewer is responsible for dealing with the Conflict of Interest (and developing a management plan if appropriate) as soon as is reasonably practicable, and in any event within 21 days of the day of the disclosure. An extension to this time frame may be required in certain circumstances and all parties will be advised where this is the case. Until that time, the member of Staff should take no direct part in the particular activity relating to the potential conflict. If a disclosure arises during recruitment deliberations or recruitment decision-making and a Conflict of Interest is identified, the disclosure would be dealt with in line with this policy.

While the University will strive to agree the management of the Conflict of Interest with the member of Staff, it is accepted that this may not always be possible. In those circumstances, the member of Staff will be directed by the COI Reviewer (in consultation with colleagues in the relevant professional area, if required) with regard to the appropriate management. Some Conflicts of Interest will require ongoing management and this should be documented in the management plan. It is recommended that Conflicts of Interest, where ongoing management is required, should be reviewed every three months and the results documented.

The member of Staff shall provide all information necessary to the COI Reviewer for the purposes of allowing the COI Reviewer to resolve the matter appropriately.

Where a Conflict of Interest relates to an externally funded research project (i.e. where the interest influences, potentially influences, or could be perceived to influence, the design, conduct or reporting of such project), the COI Reviewer shall consult the Vice President for Research and Innovation (where they are not the COI Reviewer) in respect of any steps to be taken and these must be compatible with the terms and conditions of the award and the external funding agencies conflict of interest policy.

5.3.1 Examples of mechanisms by which a Conflict of Interest may be resolved

It is impossible to identify all potential resolution(s) that may be arrived at by the COI Reviewer. The following, non-exhaustive list, may be considered as examples of mechanisms by which a Conflict of Interest may be resolved:

Conclusion that there is no Conflict of Interest. In these circumstances the declaration of the interest and/or activity and subsequent authorisation by the COI Reviewer will be held on the local Register of Conflicts of Interest, unless the Conflict of Interest relates to Intellectual Property and/ or spinout companies in which case it is also to be held centrally by OCLA for reporting purposes

Permission to continue the activity with modifications. Non-exhaustive options for modifications include but are not limited to:

- disclosure of all pertinent information to other relevant individuals/parties;
- exclusion from, or third party review of, any decision-making/authorisation;
- revisions to the research proposal or other plans;

- reduction of involvement in the activity;
- close monitoring of the activity and in particular the evaluation of any relationship;
- termination of involvement by others (for example: a relative or friend) in the activity; and
- divestiture of relevant personal interests.

Conclusion that the member of Staff should not be involved in any way, thus removing the Conflict of Interest. Where no alternative modifications to the activity can be agreed upon, this will be the solution, by default. A record of this will be held centrally on the local Register of Conflicts of Interest, unless the Conflict of Interest relates to Intellectual Property and/ or spinout companies in which case it is also to be held centrally by OCLA for reporting purposes.

5.3.2 Outcome of the Conflict of Interest review

The COI Reviewer shall communicate the outcome of the review to the member of Staff and copies provided to the relevant parties (e.g. Head of College, Head of Function, VPRI, OCLA). It is the responsibility of those affected to comply with the approach that has been communicated. It should be noted that should a member of Staff not comply then the University's disciplinary procedures (or equivalent) may be activated.

Where permission is granted to continue the activity with modifications, then the Head of College/Functional Area is responsible for overseeing that all modifications imposed are being implemented. The Head of College/Functional Area is required to conduct a review of all modified activities pursuant to this Policy and to remit a statement confirming compliance to the OCLA on a quarterly basis. It is open to the Corporate Secretary in consultation with the President to review and revise an approach adopted by the COI Reviewer.

In addition to declaring a Conflict of Interest in accordance with this Policy, Designated Directors and Designated Positions of Employment as defined in the Ethics in Public Office Acts 1995 and 2001 (the "Acts") are required to make an annual statement of interests as provided for in the Acts to the President and to the Standards in Public Office Commission.

5.4 Managing a Conflict of Interest in relation to recruitment and promotion

5.4.1 Documentation / drafting

There is potential for a Conflict of Interest in relation to drafting the documentation relating to the post or the information for candidates, for instance, where a staff member, or a Connected Person, subsequently applies for a position where s/he has been involved in preparing the documentation relating to the post or the information for candidates.

In these circumstances, the process shall be recommenced without that individual's involvement.

Conflict of professional or personal interest or potential Conflicts of Interest should be declared, via the disclosure channels in Appendix 3, prior to the preparation of the recruitment documentation.

5.4.2 Assessment process

In relation to the assessment of a candidate for selection or promotion, a Conflict of Interest will be deemed to exist for a selection committee/promotions board member in the following circumstances:

- The selection committee/promotions board member is a collaborator with an applicant in a current project;
- The selection committee/promotions board member has supervised or is supervising an applicant when they were a post graduate student;
- The selection committee/promotions board member is related to the applicant (i.e. spouse, parent, child, sibling, uncle or aunt, first cousin, niece or nephew, fiancée or grandparent or grandchild) has or has had a personal relationship with an applicant;
- The selection committee/promotions board member has a family or social connection with the applicant, for example the applicant is a neighbour, or their children go to school together etc;
- The selection committee/promotions board member has been named as a referee by a candidate;
- Any other reason as considered relevant by the selection committee/promotions board member.

In all of the above examples the selection committee/promotion board member must make a declaration, via the disclosure channels in Appendix 3, prior to the commencement of the selection/promotion process or at the earliest opportunity thereafter.

If the Chairperson considers that they may be in a position giving rise to an actual or potential Conflict of Interest they should make contact at the earliest opportunity with the Chief People and Culture Officer or their nominee to the Board in question who will decide in light of the nature of the interest if the Chairperson is to be asked to withdraw from any decision about the candidate or take measures to manage the conflict where it is deemed manageable e.g. Chairperson role handed to another appropriate Board member or speak last.

5.4.3 Conflict which may be deemed manageable

Where it is decided that the member concerned is to remain on the committee/board, the Chairperson is responsible for managing the decision-making process and it is recommended that the individual concerned should speak last in the course of discussions on the candidates.

All decisions in relation to selection and promotion in the University are considered in accordance with the principle that all University appointments are made solely on merit.

5.4.4 Conflicts which cannot be managed

Following the declaration of a Conflict of Interest in relation to a candidate under consideration, the Chairperson will decide in the light of the nature of the interest, if the member concerned is to be asked to withdraw from any decision about the candidate.

Withdrawal of a member or of the Chairperson will be recorded in the minutes of the meeting. Where the selection committee/promotions board member is related to the applicant (i.e. spouse, parent, child, sibling, uncle or aunt, first cousin, niece or nephew, fiancée or grandparent or grandchild) has or has had, a personal relationship with an applicant, the selection committee/promotions board member shall be required to step aside automatically. In such case there shall be no option for the Chairperson or for the Chief People and Culture Officer to exercise discretion.

5.4.5 Conflict of Interest Principles

Members of search and selection committees and promotions boards together with external assessors co-opted to assess candidates are expected to observe the highest standards of integrity and objectivity and are consequently expected to adhere to the following principles:

- a) It is expected that individuals acting on behalf of the University in a decision making capacity must not permit any potential Conflict of Interest to interfere with that obligation which might compromise the integrity of the decision making process within the University in relation to selection and promotion decisions.
- b) The responsibility for avoiding potential or actual Conflicts of Interest begins with the committee/board member or external assessor themselves. If a situation arises at any time that could present a Conflict of Interest, a full timely disclosure of the relevant information must be made to the relevant Chairperson. Hence, it is the responsibility of the individual to declare a potential Conflict of Interest that arises or is likely to arise
- c) While there is no general prohibition on the grounds of family relationship against persons being employed within the University or in the same department, situations shall be avoided which could potentially lead to Conflict of Interest. This would include direct involvement in decisions affecting selection for appointment, promotion and salary of a partner, spouse, or relative.
- d) For the purposes of transparency, a selection committee/promotions board member is requested to declare to the Chairperson where they have supervised or are supervising an applicant as a post-graduate student. The currency of the supervisory relationship (within the last six years) will determine if the Conflict of Interest is deemed manageable or not manageable.
- e) Internal Selection committee members who provide a reference for a candidate who is applying for a UCC post, in circumstances where they are a selection committee member for that post are advised that they must avoid making any statement recommending the candidate for the post but should provide clear and factual information on the candidate which is related to the selection criteria for the post.

- Any reference from an internal selection committee member recommending the candidate for appointment to the post will be returned to the member prior to any circulation for revision in line with the requirements of this policy.
- f) As the role of the external assessor is to act as an objective specialist who advises the committee during the process, an external assessor shall not provide a reference for any of the shortlisted candidates.

5.4.6 Implementation in relation to recruitment and promotion

Search/selection committee members and members of the promotions boards together with those responsible for nominating selection committee members and proposing names of external assessors shall be made aware of this Conflict of Interest Policy by the People and Culture Department.

In addition, the Chair of the relevant search/selection committee and promotions boards shall be required to brief the committee/board prior to each relevant meeting as to the main provisions of this Policy.

Where decisions are being made in relation to selection and promotion, each member of the selection committee/promotions board will be asked to confirm that no Conflict of Interest exists, or if such a conflict exists it has been deemed a manageable conflict (see 5.4.3 above) and shall sign a report to this effect at the commencement of the meeting.

External assessors shall, at the time of invitation, be given details of this Policy and where possible the names and applications of the prospective candidate(s) to assist in ensuring that the impartial role of the external assessor is maintained within the appointments and promotions process. If an external assessor is invited to participate in the process at the pre-shortlisting stage when details of applications are not known and should any issue subsequently arise in terms of a candidate applying for the post which would then create a Conflict of Interest for the external assessor, then this matter should be managed in accordance with this Policy.

5.5 Recording a Conflict of Interest

A record of the conclusion will be held locally on a local Register of Conflicts of Interest .

Conflicts of Interest relating to Intellectual Property and/or spinout companies should be shared with OCLA after they have been through the COI reviewer via the following email address: conflictofinterest@ucc.ie. OCLA shall prepare an annual report at the end of each academic year on all potential Conflicts of Interest in respect of IP commercialisation and the establishment of spinout companies. This annual report will be provided to the ULT and the Governing Body.

6. Roles and Responsibilities

Table 2: Roles and Responsibilities Table

Role	Responsibility
Staff	Declaring Conflicts of Interest
Head of School/Director of RICU	COI Reviewer
Head of College/Functional	COI Reviewer
Area	Ensuring the appropriate management of Conflicts of Interest
	Quarterly compliance statement regarding modified activities
	Maintain a local Register of Conflicts of Interest
Chair of the relevant search/ selection committee and promotions board	COI Reviewer Brief the committee/board prior to each relevant meeting as to the main provisions of this policy.
Chief People and Culture Officer (CPCO)	Provide advice and support on application of this Policy
	Decides on COI outcome in relation to Chair of
	selection committee/ promotions board. COI in relation to selection and promotions can be declared to the CPCO.
Vice President of Research	Consult with the COI Reviewer where the Conflict of Interest relates to an externally funded research project COI Reviewer for Staff not aligned to a School where
	the activity relates to research
Corporate Secretary	Implementation of this Policy Provide advice and support on application of this Policy
	Provide assistance on disclosure channels
	Refer a Conflict of Interest to another party (see Declaring a COI)
	If necessary, review and revise an approach taken by a COI Reviewer
	Produce an Annual Report on Conflict of Interests in respect of IP commercialisation and the establishment of spinout companies for Governing Authority

7. Supporting Procedures, Policies and or Statutes

The Policy applies to all Conflict of Interest matters. This Policy should, where appropriate, be read in conjunction with other University policies and codes including UCC's:

- Policy on University Consultancy, Directorships and other Remunerated Academic Activity External to University College Cork
- Code of Research Conduct
- The Principal Statute
- Intellectual Property Policy
- Academic Policies
- Procurement Policies
- Disclosures Policy
- Regulation on Conduct of Governing Body Business
- Code of Practice for Governing Body Members
- Belonging at UCC

8. Breach of Policy

Failure to disclose a Conflict of Interest, or to appropriately refrain from the related activities until the management of the conflict has been resolved, constitutes a breach of this Policy and may result in the University's disciplinary procedures (or equivalent) being activated.

9. Review and Approval

This Policy will be reviewed at least every four years and within six months of any significant change in national policy or guidance.

Table 3: Document Control Table

Version	2.0
Owner	Corporate Secretary
Approved by	Version 1.0:
	Governing Body 11 June 2019, UMTO 07 May 2019, Academic Council
	03 May 2019.
	Version 2.0:
	Governing Authority 09 September 2025, Audit and Risk Committee
	28 August 2025, People, Culture, Equality, Diversity and Inclusion
	Committee 26 August 2025, University Leadership Team 29 April
	2025
Published location	https://www.ucc.ie/en/ocla/policy/conflict-of-interest/
Review date	09/09/2029

This document requires the following approvals:

10. Further Information

If you have any queries in relation to this Policy, please contact:

Corporate Secretary
The Office of Corporate and Legal Affairs
1st Floor, East Wing
Main Quadrangle
Cork

Email: conflictofinterest@ucc.ie

Appendix 1: Conflict of Interest Examples

- 1. A member of staff has several consultancy contracts that require regular trips abroad. This means that colleagues are regularly asked to cover for teaching; the staff member's PhD students have complained that they are curtailed in making progress with their thesis, publications and research projects. There is therefore a conflict between the time that the member of staff spends on consultancy and their ability to teach and support students adequately.
- 2. A member of staff is Principal Investigator in a clinical trial investigating efficacy of a new drug treatment for cancer. The staff member is also a shareholder in a spinout company established to commercialise the intellectual property generated through the trial. There is therefore a conflict between conduct of the trial, and in particular the welfare of patients during the trial, and the potential financial benefit to the member of staff.
- 3. A member of staff is funded by an IT company to investigate the future of a particular type of software in assisting with advanced clinical research. The staff member publishes an article which concludes that certain software should be used over others as the integrity of the outcomes are more reliable. The funder of the research is not declared by the member of staff. A perceived conflict with the staff member's role within the University may occur because non-disclosure of the funder may be seen to compromise the integrity of the findings.
- **4.** A member of staff is involved in drafting documentation or information for candidates relating to a position within the University that they (or a connected person) intend to apply for. There is a Conflict of Interest with the staff member's role within the University as involvement in the drafting of the documentation/ Information for candidates may be seen to compromise the integrity of the recruitment process.

Conflict Questions	Potential Examples	Category
Is the staff member involved in any external organisations whose interests might conflict with those of the University?	An organisation offering a competitive program to University or a third party entity that is directly competing for third party funding with University.	Research Academic
Does the staff member or a connected person stand to gain financially by the actions of UCC that the staff member can or might appear to influence?	Interests of the staff member (or a family member or close associate) might have in partnerships or companies that may provide goods, property or services to the University.	Procurement
Apart from a salary does the staff member stand to gain financially from his/her work at the University?	If the staff member wanted to use the results of work done by a student in a business that the staff member owned or if the staff member requires students to buy a book in respect of which the staff member receives a royalty.	Research Academic

Does the staff member have any personal or financial interests that might be advanced by a particular result from his/her research	If the research is sponsored by a party who might have an interest in a particular result being achieved and may stand to benefit financially or otherwise from such an outcome. A Conflict of Interest problem arises when a staff member wants to use grant funds to employ an immediate family member, or the staff member intends to purchase equipment for his/her research from a company in which the staff member	Research
	of an immediate family member has an interest.	

Conflict of Interest Form Version 2



For guidance, refer to the Conflict of Interest Policy available at Conflict of Interest Policy and the Conflict of Interest Procedure available at Disclose and Manage.

All staff: Please complete this form, including as much detail as possible in relation to the Conflict of Interest. After you have filled out the form, email it to the appropriate Conflict of Interest Reviewer. You can find the correct reviewer in the table at Disclosure Channels webpage.

Conflict of Interest Reviewer: Review the disclosure and, if required, request further information from the person who disclosed. Please complete the 'Management Plan' below and any other sections that are relevant.

Recording of the Conflict of Interest: A record of the Conflict of Interest conclusion should be held locally on a local Register of Conflicts of Interest. Conflicts of Interest relating to Intellectual Property and/or spinout companies should be shared with OCLA after they have been through the COI reviewer via the following email address: conflictofinterest@ucc.ie.

Name:		Job ⁻	Title:		
Email:		Staf	f#:		
Reporting to:		Head	d of College/Functional Area:		
COI Reviewer: (Name)		COI	Reviewer: (Email)		
POTENTIAL CONFL	LICT OF INTEREST D	ETAILS			
*Please provide details of the	e potential Conflict of Interest in	n the box below			
Conflict Tyme	□ Name	☐ Actual	□ Parasina d	☐ Potential	
Conflict Type:	None	∟ Actual	☐ Perceived	□ Potential	
Conflict	☐ Academic	Directorship/	Recruitment/	Sale/Supply	Spinout/
Category:	Academic	Consultancy	Promotions	/ Purchase	Startup/IP
Category: MANAGEMENT PLA		Consultancy	Promotions Research	l / Purchase	Startup/IP
MANAGEMENT PLA *Describe how the	AN Conflict of Interest will L	ne managed, any act	Promotions Research ions that need to be undertaken by a monitored. If a follow-up is neces	the staff member to address the	Conflict of
MANAGEMENT PLA *Describe how the Interest and how the	AN Conflict of Interest will L	ne managed, any act	ions that need to be undertaken by	the staff member to address the	Conflict of
*Describe how the Interest and how the details.	AN Conflict of Interest will L	ne managed, any act ict of Interest will be	ions that need to be undertaken by	the staff member to address the	Conflict of
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*Describe how the Interest and how the details.	AN Conflict of Interest will <i>k</i> e management of the Confl	ne managed, any act ict of Interest will be	ions that need to be undertaken by	the staff member to address the	Conflict of
*Describe how the Interest and how the details. ANY OTHER RELEVA	AN Conflict of Interest will <i>k</i> e management of the Confl	ne managed, any act ict of Interest will be	ions that need to be undertaken by	the staff member to address the	Conflict of
*Describe how the Interest and how the details. ANY OTHER RELEVENCE.	AN Conflict of Interest will be management of the Confl VANT INFORMATIO	oe managed, any act ict of Interest will be	ions that need to be undertaken by monitored. If a follow-up is neces	the staff member to address the	Conflict of
*Describe how the Interest and how the details. ANY OTHER RELEVA	AN Conflict of Interest will be management of the Confl VANT INFORMATIO	ne managed, any act ict of Interest will be	ions that need to be undertaken by	the staff member to address the	Conflict of

Appendix 3: Conflict of Interest - Disclosure Channels

The expectation is that a Conflict of Interest shall be disclosed through the following channels. Staff members are required to make the disclosure to the first channel unless the disclosure relates or involves the person to whom otherwise the disclosure would be made. Thereafter channels should be utilised sequentially.

Type of Issue	1 st Channel	2 nd Channel	3 rd Channel
Academic Issue	Head of School	Head of College	Corporate Secretary
Research Issue: (Staff aligned to a School)	Head of School	Head of College / VP for Research and Innovation for Staff	Corporate Secretary
Research Issue: (Staff not aligned to a School)	Head of Research Centre	Head of College / VP for Research and Innovation for Staff	Corporate Secretary
Spinouts/Start Ups/IP Issues:	Head of School / Function	Head of College/ Chief Financial and Operations Officer/ VP for Research and Innovation for Staff	Corporate Secretary
Sale, Supply or Purchase of Goods and Services	Head of School/ Function	Head of College/ Chief Financial and Operations Officer	Corporate Secretary
Directorship/ Consultancy	Head of School / Function	Head of College/ VP for Research and Innovation for Staff	Corporate Secretary
Recruitment and Promotions	Chairperson of selection committee/ promotion board	Chief People and Culture Officer	Corporate Secretary

If you require any assistance or guidance on the appropriate disclosure channels, please contact the Corporate Secretary and you will be directed as appropriate.