

Wolfson College
Conflict of Interest Policy

Why the College has a Policy

1. Conflicts of interest may arise where an individual's personal, business, family or other interests and/or loyalties conflict with those of the College. These interests may be financial or emotional. Such conflicts may create problems, as they can:
 - inhibit free discussion;
 - result in decisions, or actions, that are not in the best interests of the College;
 - risk the impression that the College has acted improperly.

The aim of this policy is to protect the College and the individuals concerned from any appearance of impropriety.

2. The establishment of links between College trustees, members and staff and outside bodies - whether Government departments, commerce, industry, or others - is not only in the public interest but also benefits the College and the individuals concerned. However, it is possible that such links may give rise to conflicts of interest. The College has therefore prepared the following guidelines and rules to help individuals assess whether or not activities, discussions or decisions could cause a conflict of interest, and to outline the procedure for disclosure of any actual or potential conflict.

Guidelines as to Conflict of Interest

3. It is not possible to define all the circumstances which may cause a conflict of interest, but the following are examples of situations giving rise to a perceived conflict of interest (in any situation where an individual is uncertain as to the propriety of a given arrangement, advice may be sought from the President or Bursar):

(a) Use of the College's research or administrative facilities to pursue personal, business, commercial, or consulting activities.

(b) Any attempt to restrict rights governing the timing and content of publications, except in circumstances properly approved by the College to protect privacy, commercially sensitive proprietary information, and patentable inventions.

(c) Involvement in externally funded activity which might infringe the right of a student engaged in the activity to complete the degree for which he or she is registered, and/or to publish freely his or her findings (except in the circumstances referred to in sub-paragraph (b) above).

(d) A financial interest held by an individual (or by his or her immediate relative(s) or household member(s)) in an external enterprise engaged in activities closely related to that individual's line of research in the College. Examples of such interests are paid consultancies, paid service on a board of directors or advisory board, or equity holdings in or royalty income from the enterprise. The existence of such an interest does not necessarily imply conflict, but is likely to give an appearance of conflict, and should be declared.

(e) A personal involvement (or by his or her immediate relative(s) or household member(s)) in any company or commercial enterprise which is in a contractual relationship with the College, or which is in the process of negotiating a contract with the College, where the member has been concerned or connected with placing or negotiating the contract in question or with the research or other activity which the contract might cover.

(f) Application by family members or friends for fellowship, membership or employment in the College, where an individual is in a position to influence the appointing process.

- (g) Receipt of gifts or hospitality by an individual (or by his or her immediate relative(s) or household member(s)) from a company or organisation offering goods or services to the College.
4. The College has adopted the specific rules set out below in order to declare and consider conflicts of interest:
- a) Trustees have a personal responsibility to declare conflicts of interest in order to fulfil their legal obligations to act only in the best interests of the College. Further guidance on conflicts of interest is available in the Charities Commission's Essential Guide to being a Trustee, which is issued to all Trustees on appointment.
 - b) All Trustees will be asked, on appointment, and on annual review to declare and record all other interests, employment or memberships which could be construed as a conflict. The declarations will be made on the attached form, and will be reviewed by the College Officers and the Conflict of Interest Committee annually.
 - c) All GBF/Trustees will give proper consideration as to any interests that could be perceived as a conflict, and ensure that they declare such at the start of any relevant meeting or Committee, and withdraw from any item where a perception of or actual conflict might exist.
 - d) The chairs of all committees will ask all members at the start of each meeting to declare any interests of conflict so that they can be properly recorded and so that the 'conflicted' person can withdraw from the appropriate item, and the minutes annotated accordingly.
 - e) Enter any gifts given or received in the Gift and Hospitality Register maintained by the PA to the Bursar in accordance with the gifts and hospitality policy at [https://www.wolfson.ox.ac.uk/sites/wolfson.ox.ac.uk/files/gifts and hospitality-policy-wolfson.pdf](https://www.wolfson.ox.ac.uk/sites/wolfson.ox.ac.uk/files/gifts%20and%20hospitality-policy-wolfson.pdf)
 - f) Decline or withdraw from any recruitment process involving a candidate who is related or known to the extent that a conflict exists.

Data Protection

5. Any information provided will be processed in accordance with data protection principles as set out in the GDPR. Data will be processed only to ensure that members of the Governing Body and others within the scope of this policy act in the best interests of Wolfson College. The information provided will not be used for any other purpose.