

St Catherine's College

Conflict of Interest Policy

1 Purpose of policy

The establishment of links between College 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 on occasion such links may give rise to actual or perceived conflicts between the interests of the College, on the one hand, and those of the staff member and/or outside body in question, on the other, which may call into question the staff member's ability effectively to fulfil his or her responsibilities to the college. The College has therefore prepared the following guidelines and rules to help individuals assess whether or not proposed activities may give rise to a conflict of interest, and to outline the procedure for disclosure of any actual or potential conflict and for the taking of further steps to avoid or minimise such conflict.

For the avoidance of doubt, this policy shall also apply to Fellows of the College, as defined in the Statutes, whether or not they are staff members and references in this policy to "staff members" and "employment" should be construed accordingly.

2 Some Guidelines as to Conflicts of Interest

It is not possible to define all circumstances which may cause, or give rise to a perception of, a conflict of interest, and staff members must consider carefully whether any appointment or arrangement (whether existing or future) does so, but the following are common-sense examples of situations giving rise to an actual conflict of interest or, at a minimum, to a perception that a conflict of interest exists or may exist.

(i) Inappropriate use of the College's research or administrative facilities or the College's name or reputation to pursue personal, business, commercial, or consulting activities. [See also the Charity Commission's *Conflicts of Interest: a guide for charity trustees* (CC29)]

(ii) Any occupation or activity likely to interfere with the proper discharge of the staff member's duties to the College, or which may mean that the staff member is unfit to continue in post.

(iii) A personal financial interest held by an individual (or immediate relative or household member) in an external enterprise engaged in activities closely related to that individual's employment in the College, other than a salary received from the University of Oxford or royalty payments received in the ordinary course from the individual's exploitation of the intellectual property rights to research to which he or she is entitled by virtue of his or her employment.

(iv) A personal (or immediate relative's or household member's) involvement in any company or commercial enterprise which is in a contractual relationship with the College, or which is in the process of seeking or negotiating a contract with the College.

(v) Application by family members or friends for employment in the College or in a related company without full disclosure of the relationship.

(vi) Receipt of gifts or hospitality to the total value of more than £15 by an individual (or by his or her immediate relative(s) or household member(s)) from a company, organisation or person (other than the University of Oxford) offering goods or services to the College or otherwise seeking to influence or benefit from the conduct of college business. The College has put in place a policy under the Bribery Act 2010. Such gifts or hospitality should be reported to the Home Bursar under this policy.

<https://www.stcatz.ox.ac.uk/modules/ckeditor/ckfinder/userfiles/files/AntiBriberyPolicy.pdf>

3 External Appointments

In addition to observing the University of Oxford's general requirements relating to the holding of other appointments, the uptake of any external appointment or arrangement which might, or might be perceived to, present any conflict with College duties should be referred in advance to the Master and Bursars, giving full information as to the nature or the appointment or arrangement in question.

4 Disclosure and further steps

It is the duty of all staff members to disclose any actual or potential conflict of interest in full and as soon as reasonably practicable. Disclosure should always be made in writing and should be made to Dispensations Committee via the Master's Office.

In any situation where an individual is uncertain as to whether a given appointment or arrangement actually or potentially gives rise to an actual or perceived conflict of interest, advice must be sought promptly from the Master and Bursars.

When an actual or potential conflict of interest has been disclosed, the Master and Bursars shall consider whether a conflict of interest does, or is likely to arise, and, in that case, discuss and agree a possible resolution with the individual concerned. In addressing the matter, the Master and Bursars may consider that full disclosure suffices to protect the College's position, or may request the staff member to take further steps in this regard.

Any unresolved matter shall be referred to the Remuneration Committee for advice and a recommendation as to how the conflict is to be resolved.

If agreement cannot be reached to resolve the conflict, or in cases of particular difficulty, the matter shall be referred by the Remuneration Committee to the Governing Body. If the Governing Body determines that a particular appointment or arrangement gives rise to an unavoidable conflict of interest, the staff member shall, if so instructed by the Governing Body, immediately cease that appointment or arrangement.