



Trinity College Dublin

Coláiste na Tríonóide, Baile Átha Cliath

The University of Dublin

Conflict of Interest Policy

Overview and Guidance for Users

College Secretary's Office

March 2026

Why do we need a Conflict of Interest Policy?

- We need to assure the Board that procedures are in place for the effective management of potential conflicts of interest.
- The policy underpins a culture of compliance at Trinity.



How was the Policy formulated?

- Existing procedures in various policies were amalgamated into one “catch-all” policy.
- Bespoke procedures for suppliers, consultancy, committees, intellectual property, research, tender processes, and setup of a new supplier are included.
- One general procedure is provided for everything else.



What is the Purpose of the Policy?

- **Assists in identifying** actual, perceived or potential conflicts of interest
- **Establishes a system** for disclosure of conflicts of interest (i.e., a Declaration of Interest)
- **Provides guidance** to those responsible for managing actual, perceived or potential conflicts of interest
- **Assists in the resolution** of conflicts of interest in order to protect the University and its employees and other persons as set out in the scope of the policy.



Who has responsibility for declaring Conflicts of Interest?



- It is the responsibility of each **individual** to identify and declare any potential, actual or perceived conflict of interest.
- The declaration process is one of **self-declaration**.
- Where a supervisor or line manager is also involved, both parties make a shared declaration, also a process of self-declaration.

What is a Conflict of Interest?

Conflict(s) of Interest is defined as and includes the following types of conflict:

An “**actual conflict of interest**” emerges when an individual has personal interests which:

- conflict with the interests of Trinity;
- conflict with their responsibility to act in the best interests of Trinity;
- put into question the independence, impartiality and objectiveness that they are obliged to exercise in the performance of their duties.

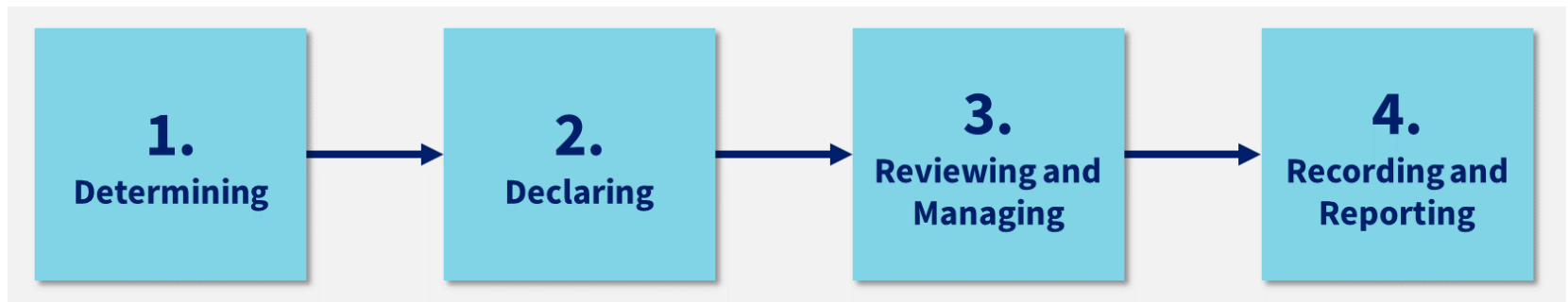
A “**perceived conflict of interest**” may arise when an individual appears to have, in the opinion of a fair-minded and well-advised person, personal interests that are sufficient to put into question the independence, impartiality and objectiveness that they are obliged to exercise in the performance of their duties.

A “**potential conflict of interest**” describes a situation that could develop into an actual or perceived conflict of interest.

[See section 5 of the Policy for this and other definitions.](#)

What is the Procedure in the Policy for dealing with Conflicts of Interest?

The procedure is broken down into four steps:



See section 6 of the Policy.

Step 1: Determining a Conflict of Interest

1. Determining

- Individual considers if they have an actual, perceived or potential conflict of interest.
- Section 6.1 of the policy sets out examples of conflicts of interest that may arise.

See section 6.1 of the Policy.

Step 2. Declaring a Conflict of Interest

2. Declaring

- Responsibility of each individual within scope of this policy to identify and declare any potential, actual or perceived conflicts of interest.
- The individual makes the declaration to the individual's line manager.
- The line manager will act as the “Reviewer” of the declaration.
- The declaration is made by completing **Part A of Declaration of Interest Form** (in Appendix 1 to the Policy)

See section 6.2 of the Policy.

There are a number of Activities with their own Reviewers / Bespoke Procedures

Activity	Reviewers
Supplier	Contract Liaison Person / Financial Services Division Contact
Committee or Working Group	Chair of the Committee / WG
Consultancy	Joint Trinity Innovation and Enterprise and Head of School/Director of TRI
Intellectual Property and/or commercialisation	Joint Trinity Innovation and Enterprise (Director of Knowledge Exchange (KnEx)) and Head of School/Director of TRI
Research funding applications or research activity	Trinity Research
Tender processes	Trinity Procurement Office
Setup of a new supplier	Head of Discipline/School/Unit/TRI, supported by Trinity Procurement Office

See section 6.2 of the Policy.

Step 3. Reviewing and Managing the Conflict of Interest

- The Reviewer discusses the issue with the individual.
- The Reviewer consults with other relevant employee(s) with appropriate seniority and expertise to address the issue, if necessary.
- The Reviewer determines if an actual, perceived or potential conflict of interest exists.
- If it does not exist, the individual is notified and the decision is recorded on **Part B of Declaration of Interest Form**, signed by Reviewer and countersigned by Head of School/TRI/Unit/Officer as appropriate.

See section 6.3 of the Policy.

Step 3 (cont.). Reviewing and Managing the Conflict of Interest

- If it is determined that an actual, perceived or potential conflict of interest does exist, action is taken to manage the conflict, the individual is notified and Part B of the Declaration of Interest Form is completed.
- The Reviewer must prepare a conflict management plan, setting out how the conflict of Interest is to be managed, also documented on Part B of form.
- Examples of measures to manage the conflict of interest are listed in section 6.3.2 of the Policy.

See section 6.3 of the Policy.

Step 4. Recording and Reporting on Conflicts of Interest

4. Recording and Reporting

- The Reviewer provides the individual with a copy of the completed form, including Part B.
- The Individual signs the form to indicate agreement with and acknowledgement of the decision.
- File of copies of signed declaration forms kept in School/TRI/Unit in which submitted.

See section 6.4 of the Policy.

Step 4 (cont.). Recording and Reporting on Conflicts of Interest

4. Recording and Reporting

- Annually in October, each School/TRI/Unit produces a summary report, using the **template in Appendix 2** to the Policy, listing all Declarations of Interest submitted during preceding financial year (1 October to 30 September) to Secretary to the College.
- Secretary to the College prepares a high-level summary of all recorded conflicts of interest and management mechanisms put in place.
- Brought to Risk and Compliance Committee and Board in December annually for preceding financial year.

See section 6.4 of the Policy.

Further Information and Support

- **FAQs** and **Examples** on Conflict of Interest Webpage will be updated as needed. See: <https://www.tcd.ie/about/policies/university-policies/conflict-of-interest-policy/>.
- **Secretary's Office** will provide support and answer any queries relating to the Conflict of Interest Policy (email secretary@tcd.ie).
- Queries specific to consultancy, intellectual property, research, tender processes, and setup of a new supplier should be directed to the relevant Unit for response.

