



Conflict of Interest Policy

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1. Context

At Trinity College Dublin, the University of Dublin, hereinafter Trinity or the University, we promote a diverse, interdisciplinary and inclusive environment underpinned by the highest standards of integrity which provides the framework within which to deliver our mission of high-quality education and research and other activities of benefit to the public good.

Trinity recognises that it has diverse interests and contacts within the local, national and international communities. It considers that links between persons engaged in Trinity activity and outside bodies are often in the public interest as well as beneficial to the University and to individuals. However, it also recognises that it is possible that such connections may give rise to potential, actual or perceived conflicts of interest. Equally, it acknowledges that it is likely for individuals to whom this policy applies to have external interests which run parallel to, or have no connection whatsoever with, the interests of Trinity.

Trinity acknowledges that, in general, individuals will recognise conflicts of interest and will want to ensure that there can be no perception of their receiving an inappropriate advantage and that they are personally beyond reproach. It also recognises that, in most cases, potential conflicts of interest will be easily avoided or resolved by the simple disclosure of potentially conflicting activities.

This policy has regard to the [Ethics in Public Office Act 1995](#), the [Standards in Public Office Act 2001](#), the [Universities Act 1997](#), and [The 2010 Consolidated Statutes of Trinity College Dublin and of the University of Dublin](#) and relevant [policies](#) of the University. It upholds the provisions of the [Code of Practice for the Governance of State Bodies 2016](#), the 2010 Consolidated Statutes of Trinity College Dublin and of the University of Dublin, and [Trinity's Code of Conduct for Members of the Board and of Principal Committees of Board](#) and [Code of Conduct for Employees](#) as they pertain to conflicts of interest. This policy does not undermine the principles of academic freedom as established in the Universities Act 1997 and in Trinity's [Academic Freedom Policy](#).

This policy does not absolve, in any way, obligations that employees may have to submit a disclosure of interest to the Standards in Public Office Commission to comply with the provisions of the Ethics in Public Office Act 1995 and the Standards in Public Office Act 2001.

2. Purpose

This policy sets out the principles which apply where the personal interests of individual members of the Trinity community conflict with the interests of Trinity, conflict with their responsibility to act in the best interests of Trinity, and/or put into question the independence, impartiality and objectivity that they are obliged to exercise in the performance of their duties. It is designed to promote and support the awareness and appropriate management and avoidance of potential, actual or perceived conflicts of interest when they occur.



The purpose of this Policy is to:

- assist in identifying actual, perceived or potential conflicts of interest
- establish a system for disclosure of conflicts of interest (i.e., a Declaration of Interest)
- provide guidance to those responsible for managing actual, perceived or potential conflicts of interest
- assist in the resolution of conflicts of interest in order to protect the University and its employees and other persons as set out in section 3 below.

3. Scope

This policy applies to:

- (i) All Trinity employees, whether full-time or part-time, permanent or temporary;
- (ii) All employees of Trinity's wholly owned subsidiary companies;
- (iii) Non-University employees who use Trinity funds, facilities or other resources, including Trinity's name and reputation, to carry out teaching and/or research, and/or participate in Trinity-administered research, including retired employees, visiting faculty and researchers; consultants, suppliers, affiliated hospital staff, industrial personnel and research fellows, regardless of obligations to other companies or institutions;
- (iv) All persons conducting teaching and/or research at or under the auspices of Trinity, including visiting faculty and researchers; consultants; suppliers; Emeritus or adjunct appointments; and research fellows;
- (v) Students involved in teaching and assessment.
- (vi) All members of Trinity's decision-making bodies and committees, including student and external members.

This policy applies to all persons in the above listed categories (i) to (vi), regardless of whether they also fall into a category of persons not covered under the scope of this policy, such as part-time/casual employees who are also students of the University. It should be noted that every reference to "individual" contained in this policy will mean any individual provided for within the scope of this policy as set out in this section.

Trinity expects all third parties with which there is engagement in transactions or possible transactions with Trinity to adhere to the principles outlined in this policy.

All members of Trinity's committees must comply with the relevant declaration of interest requirements of those bodies.

This policy relates to any actual, perceived or potential conflicts of interest arising in connection with Trinity's activities with the exception of the following:

- Conflict of interest provisions as they relate to members of the Board and its Principal Committees which are set out in the 2010 Consolidated Statutes and in the Code of Conduct of Members of the Board and of Principal Committees of Board. These



provisions are informed by principles and provisions contained within the Code of Practice for the Governance of State Bodies 2016 and by national legislation and are outside the scope of this policy.

- Conflicts of Interest which may arise in the University in relation to the formal decision-making process concerning recruitment, selection and promotion are also outside the scope of this policy and are addressed in the HR Recruitment Policy and Staff Review Procedures, see <https://www.tcd.ie/about/policies/hr-policies/>.

The obligations of Trinity employees as they relate to conflicts of interest are set out in the [Code of Conduct of Employees](#) and should be read in conjunction with this policy.

The Ethics in Public Office Act 1995 has specific disclosure requirements for certain categories of employees that must be observed. Details may be found at: <https://www.irishstatutebook.ie/eli/1995/act/22/enacted/en/html>. These requirements are in addition to all other statutory obligations of disclosure.

The processes for declaring conflicts of interest are outlined in Section 6.

4. Principles

The Conflict of Interest Policy is based on the following principles:

- (i) As an institution in receipt of public and other funds, Trinity has a duty to fulfil the highest standards of corporate governance. Trinity is therefore committed to the accepted principles of public life, which embrace selflessness, integrity, objectivity, accountability, openness, honesty and leadership. This policy is consistent with and supports this commitment.
- (ii) Each employee has an obligation to act in the best interests of the University in relation to their University duties, activities and employment.
- (iii) Individuals within the scope of this policy are first and foremost bound to fulfil the terms and conditions of their engagement with the University (as set out, for example, in a contract of employment). Adhering to the duties and responsibilities of their roles is the primary means for avoiding conflicts of interest.
- (iv) Individuals within the scope of this policy have a duty of trust and confidence to the University and are required while engaged in University duties to accord their primary professional loyalty to the University.
- (v) Employees in particular are expected to arrange outside obligations, personal interests and activities so as not to conflict with their overriding commitment to the University.
- (vi) Trinity has an obligation not to interfere in the private concerns of its employees¹ where these have no bearing on the legitimate interests of the University.

¹ This does not include private consultancy which requires a declaration under the Consultancy and Outside Earnings Policy.



- (vii) Trinity will deal with issues raised under this policy in a prompt, fair, reasonable and objective manner, paying due attention to the effects of any actions on an employee's work, career and reputation.
- (viii) It is the responsibility of each individual to identify and declare any potential, actual or perceived conflicts of interest, whether financial, beneficial, personal, ethical, legal, or other, so that this does not become a complicating or actionable issue. The declaration process is one of self-declaration. Where a supervisor or line manager is also involved, there is a shared declaration which is also a process of self-declaration, shared by both parties involved.
- (ix) The existence of an actual, perceived or potential conflict of interest does not necessarily imply wrongdoing on anyone's part. However, any private, personal or commercial interests which give rise to such a conflict of interest must be recognised, disclosed appropriately and either eliminated or properly managed.
- (x) Where there is a doubt as to whether an activity may constitute a conflict of interest, then individuals must act as though the activity is an actual conflict of interest.
- (xi) Individuals may not themselves determine whether there is a conflict of interest and if so how such a conflict will be managed.

5. Definitions

5.1 Conflict of Interest: For the purposes of this policy, "**Conflict(s) of Interest**" is defined as and includes the following types of conflict:

- (i) 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 objectivity that they are obliged to exercise in the performance of their duties.
- (ii) 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 objectivity that they are obliged to exercise in the performance of their duties.
- (iii) A "**potential conflict of interest**" describes a situation that could develop into an actual or perceived conflict of interest.

5.2 "Connected Person" includes:

- an individual's child, stepchild, parent, grandchild, grandparent or sibling.
- an individual's spouse/civil partner or the spouse/civil partner of any person listed above.



- 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 3 points above, has a substantial interest.
- any person included within the definition of Connected Person as set out in Section 220 of the [Companies Act 2014](#) and the Ethics in Public Office Acts 1995 and 2001.

5.3 “Personal interests” may include (but are not limited to):

- (i) The performance of financial or other economic investments, including occupational income, shares, directorships, etc.
- (ii) Personal or family ambition, wealth or status gain.
- (iii) The achievement or realisation of particular political, academic, economic or social objectives.

The personal interests could be direct or indirect and include the interest of a Connected Person.

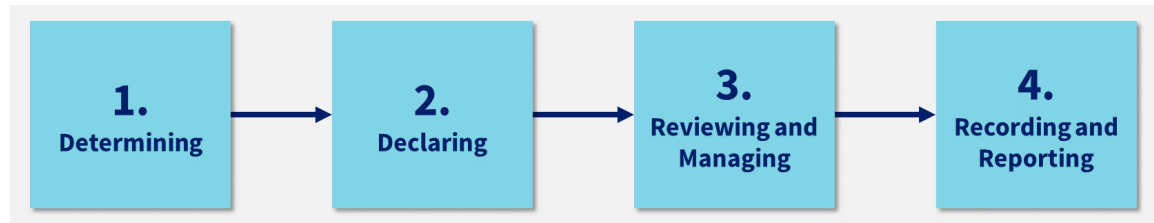
5.4 “Reviewer”: The person to whom the conflict of interest has been disclosed.

6. Policy

Individuals within the scope of this policy must always disclose an interest that may present a conflict of interest, i.e., make a Declaration of Interest. Where there is a doubt as to whether the activity may constitute a conflict of interest, then individuals must act as though the activity is an actual conflict of interest. Individuals may not themselves determine whether there is a conflict of interest and how such a conflict will be managed if identified. Failure to disclose a conflict of interest will always constitute a breach of this policy. See section 7 for further information.

The key steps in dealing with an actual, perceived or potential conflict of interest are:

- (i) Determining that an actual, perceived or potential conflict of interest exists (Individual’s responsibility);
- (ii) Declaring such a conflict of Interest (Individual’s responsibility);
- (iii) Reviewing the disclosure (Reviewer responsibility) and where it is determined that a conflict of interest exists, managing such a conflict of interest by preparing a conflict management plan (Reviewer responsibility);
- (iv) Recording the conflict of interest outcomes (Reviewer responsibility) and reporting annually on conflicts of interest to the Secretary to the College/Director of Governance (Head of School/TRI/Unit responsibility) and to the Board (Secretary to the College/Director of Governance responsibility).



Further information on each of these steps is set out in sections 6.1 to 6.4 and summarised in the Flowchart in Appendix 3.

6.1 Determining a Conflict of Interest

In order to determine whether a conflict of interest exists, it should be determined whether the private, personal or commercial interest is likely to interfere, or appear to interfere, with the objective judgement the individual should show in performing their University duties. When an individual is attempting to identify whether they may have a conflict of interest, that individual should consider whether a reasonable person would think those interests and loyalties, including those of a Connected Person, could conflict or appear to conflict with their University duties.

Conflicts of interest that may arise in connection with the activities that fall under this policy, may include, but are not limited to, the following:

Individuals using their position of employment or engagement with Trinity to:

- influence a contract to provide favourable terms for a company in which they, or a Connected Person, have a financial interest or any other personal interest;
- accept gifts, gratuities or favours from a third party engaged in or wishing to engage in transactions with the University, except in the case of customary gifts of a nominal value²;
- influence employment, promotion, admission to a course of study, educational progression or other financial or non-financial benefit for a Connected Person;
- obtain financial or non-financial benefits for themselves or for a Connected Person in return for providing advantage, or potential advantage to a person they are connected with;
- use Trinity resources³ or Trinity confidential information for personal financial or non-financial benefit, or benefit to a Connected Person;
- conduct business or activity, inside or outside of Trinity, which adversely affects Trinity or any employee's ability to perform their Trinity duties;
- compromise research objectivity or independence in return for financial or non-financial benefit for them or for a Connected Person;

² Nominal value in this instance refers to gifts with a combined value of no more than €650 per annum as per the Ethics in Public Office Acts 1995 and 2001.

³ This does not apply in situations where a researcher has founded a spin out and requires a facility agreement for the spin out to access Trinity resources.



- influence research grants or research activity;
- provide Trinity resources below market rates;
- provide favourable contractual terms to a Trinity Campus Company, Start-up or Spin-In to which they are connected.

It may also include having any close relationship (current or historical) with the supplier/contractor.

6.2 Process for Declaring a Conflict of Interest

It is the responsibility of each individual within the scope of this policy in the first instance to identify and declare any potential, actual or perceived conflicts of interest, whether financial, beneficial, personal, ethical, legal, or other, so that this does not become a complicating or actionable issue. If a conflict of interest situation arises, the individual must self-declare the conflict of interest in writing, and seek a resolution. Unless requested by the reviewing parties, they must then take no part in the matter(s) relating to that interest unless, and until such time as the potential conflict is resolved.

Conflicts of interest must be disclosed to the individual's line manager, who will act as the Reviewer. In cases where the interest relates to University activities outside the control of that manager, the conflict must be disclosed to the person responsible for those activities (such as the chair of a committee, Head of Unit, Head of School, etc). Where the individual making the declaration of interest is unclear who is responsible for the activity related to the disclosure, the disclosure must be made to the line manager. Notification of the declaration will be provided through completion of **Part A** of a **Declaration of Interest Form** as set out in Appendix 1. It should include sufficient information to enable appropriate resolution, which is likely to include: the type of conflict of interest, the nature of the activity, a list of all parties involved, the potential financial or non-financial interests or benefits, and any other relevant information.

Where a line manager or person responsible for the activity becomes aware of a possible conflict of interest which the relevant individual appears not to have considered, the line manager or person responsible for the activity must bring it to the individual's attention for appropriate consideration as to whether the individual should self-declare a conflict of interest.

In instances where the conflict of interest involves both the individual and the individual's line manager, a shared declaration should be made to the person with authority over the line manager, e.g., Head of Discipline, School, Trinity Research Institute (TRI) or Unit, the appropriate College Officer, such as the Faculty Dean, Chief Innovation and Enterprise Officer, or Dean of Research, or Head of Division (Vice-Provost/Chief Academic Officer, Chief Financial Officer, or Chief Operating Officer) or in the case of the Provost's Directorate or if the Provost is implicated, the Secretary to the College/Director of Governance.



Activities which determine a specific review process:

As illustrated in the below table, in some instances, specific activities will determine the Reviewer(s) including:

- In the case of a supplier for goods or services, the declaration of interest will be made to the relevant contract liaison person.
- Regarding a conflict of interest that relates to a committee or working group, the declaration of interest will be made to the chair of that committee or working group.
- In instances where the conflict of interest relates to consultancy, the declaration will be made to Trinity Innovation and Enterprise, according to the Consultancy and Outside Earnings Policy, see section 6.2.1.
- In instances where the conflict of interest relates to activities covered by the Policy, Practice and Regulations on Intellectual Property, Trinity Innovation and Enterprise must be notified, see section 6.2.2.
- Regarding a conflict of interest that relates to research funding applications or research activity, the declaration will be made to Trinity Research, see section 6.2.3 for further information.
- Regarding a conflict of interest that relates to tender processes, the declaration will be made to the Trinity Procurement Office, see section 6.2.4 for further details.
- Regarding a conflict of interest that relates to the setup of a new supplier, the declaration will be made to the Head of Discipline/School/Unit/TRI, supported by the Trinity Procurement Office, see section 6.2.5 for further details.

Table 1: Specific Activities which determine who the Reviewer(s) are

Activity	Reviewers
Supplier	Contract Liaison Person/Financial Services Division Contact
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 the Trinity Procurement Office
Committee or Working Group⁴	Chair of the Committee

⁴ Conflict of interest provisions as they relate to members of the Board and its Principal Committees are set out in the Code of Conduct of Members of the Board and of Principal Committees of Board. Conflicts of Interest which may arise in the University in relation to the formal decision-making process concerning recruitment, selection and promotion are addressed in the HR Recruitment Policy and Staff Review Procedures, see <https://www.tcd.ie/about/policies/hr-policies/>.



6.2.1 Process for Declaring a Conflict of Interest related to Consultancy

CONSULT Trinity (Consult@tcd.ie) must be informed of any potential conflict of interest that may arise before or during the undertaking of consultancy. Declarations of interest of all participants or proposed participants in consultancy must be disclosed at the time of contract acceptance. In all cases where consultancy work is undertaken in a private capacity and the consultant also seeks a contract with the same third party for work to be conducted through Trinity, the nature and quantity of the work being carried out in a private capacity must be disclosed by the consultant to Trinity (acting through CONSULT Trinity). Trinity may advise that the consultancy work is taken in-house and administered by CONSULT Trinity or decline to enter into any contract with third parties if the scale of such work with Trinity is inappropriate relative to the private consultancy. Trinity may also decline to enter into any contract with third parties if the nature of the work may compromise the independence or integrity of the University.

6.2.2 Process for Declaring a Conflict of Interest related to Intellectual Property

While the onus for declaring a potential conflict of interest rests with the individual, Trinity Innovation and Enterprise will support and assist with identifying potential, actual or perceived conflicts of interests that may arise associated with activities covered by Trinity's Policy, Practice and Regulations on Intellectual Property.

Trinity Innovation and Enterprise must be notified of any potential conflict of interest by the individual.

6.2.3 Process for Declaring a Conflict of Interest related to Research

While the onus for declaring a potential conflict of interest rests with the individual, Trinity Research will support and assist with identifying potential, actual or perceived conflicts of interests that may arise in connection with applying for research funding, or during the performance of any research activity.

Disclosure of any potential conflict of interest is essential for the responsible conduct of research. This should cover disclosure of such interests to the persons responsible for institutional research management, to the editors of journals to which papers are submitted and to bodies from which funds are sought.

An obligation is placed on the recipients of all research grants to declare any interest that would interfere with or compromise the performance of research supported by the grantor. This is to ensure the technical integrity and impartiality of the researcher's work. This will involve completing a Declaration of Interest document that is to be signed at contract signature stage. The absence of interest, or an official declaration of interest for all participants or proposed participants in research, must be disclosed at the point of research contract acceptance (or earlier if required by research sponsors). Every researcher should exercise responsibility when applying to and/or accepting money from a sponsor. Intentionally failing to



reveal a known interest may be regarded as research misconduct and may be subject to disciplinary action. When circumstances may exist (at research contract acceptance stage or during the course of any research project) which could lead to a conflict of interest or be seen to do so, the investigator is required to divulge sufficient such information in writing to Trinity Research.

If a researcher working with an organisation is approached by a competing entity, the onus is on the researcher to inform the latter entity that they are already conducting some work for the former entity provided there is a substantial overlap in the research endeavour. Similarly, the researcher should only accept a contract with the latter entity if they have informed the former entity of this new contract (if there is a substantial overlap in the research endeavour).

6.2.4 Process for Declaring a Conflict of Interest related to Tender processes

While the onus for declaring a potential conflict of interest rests with the individual, Trinity's Procurement Office will support and assist with identifying potential, actual or perceived conflicts of interest that may arise in connection with a tender process.

Disclosure of any potential conflict of interest is essential for the responsible conduct of a tender process. When circumstances may exist (at any stage of a tendering process) which could lead to a conflict of interest or be seen to do so, the individual is required to divulge such information in writing to the Trinity Procurement Office. Trinity may also decline to enter into any contract with third parties if the nature of the work may compromise the independence or integrity of the University.

The Trinity Procurement Office's Declaration of Conflict of Interest and Commitment to Confidentiality (Tender Process) Form must be completed by any person who is part of the evaluation process for a tender. There is no requirement for the interests of close relatives of members to be declared, but where a potential conflict of interest exists, this should be brought to the attention of the Procurement Lead to enable further review and management.

During the course of a tender process, members of a Procurement Evaluation team are expected to observe confidentiality in relation to commercial information from prospective suppliers. Information relating to the examination, evaluation and comparison of tenders and recommendations concerning the award of a contract will not be disclosed to tenderers or other persons not officially concerned with such a process. It is incumbent on any member of the group to declare a conflict of interest which might compromise any individual's impartiality, or be reasonably perceived as doing so, in the award of a contract. Any such conflict of interest must be notified immediately to the Procurement Lead of the Procurement Evaluation Group.



6.2.5 Process for Declaring a Conflict of Interest related to a setup of a new supplier

While the onus for declaring a potential conflict of interest rests with the individual, Trinity's Procurement office will support and assist with identifying potential, actual or perceived conflicts of interest that may arise in connection with a new supplier creation process.

The Trinity Procurement Office must be notified of any potential conflict of interest by the individual when a new supplier creation request is submitted. Disclosure of any potential conflict of interest is essential for the responsible conduct of a supplier creation process.

An obligation is placed on Trinity staff members who request the setup of a new supplier to declare any interest that would compromise, or appear to compromise, or have the potential to compromise their professional judgement and integrity of Trinity.

The declaration must be made in the New Supplier Creation Form available on the Procurement website. In cases where a potential conflict is identified, it must be reported to the relevant authority within the staff member's School or Area, e.g. Head of Discipline, School, Trinity Research Institute (TRI) or Unit, or the appropriate College Officer prior to submitting the new supplier creation form.

Then the Trinity Procurement Office will require completion of a Declaration of Conflict of Interest form (Appendix 1) to enable further review and management.

The Trinity Procurement Office reserves the right to decline any supplier creation request involving third parties if the nature of the proposed work could compromise, or appear to compromise, the independence or integrity of the University.

6.2.6 Process for Declaring a Conflict of Interest related to a Committee or Working Group

In line with standard practice, any committee or working group member who has an actual, perceived or potential conflict of interest relevant to the agenda items under consideration by the committee or working group must declare this conflict of interest, where possible in advance of the meeting, to the chair and secretary of the committee or working group. The chair and secretary will agree on an appropriate means of managing the conflict identified. Where a chair identifies a potential conflict of interest, they will raise this with the secretary to the committee or working group and an appropriate means of managing the conflict will be agreed. Any such actual, perceived or potential conflict of interest will be recorded through the minutes of the meeting, including the agreed approach to the management of the conflict. There is no requirement to complete the Declaration of Interest form unless the conflict of interest relates to a matter that is not related to the business of the meeting.

Conflict of interest provisions as they relate to members of the Board and its Principal Committees are set out in the 2010 Consolidated Statutes and in the Code of Conduct of



Members of the Board and of Principal Committees of Board and are outside the scope of this policy.

Conflicts of Interest which may arise in the University in relation to the formal decision-making process concerning recruitment, selection and promotion are also outside the scope of this policy and are addressed in the HR Recruitment Policy and Staff Review Procedures, see <https://www.tcd.ie/about/policies/hr-policies/>.

6.3 Process for Reviewing the Disclosure and Managing a Conflict of Interest

On receipt of a written disclosure of an actual, perceived or potential conflict of interest (as a completed Part A of the Declaration of Interest form), the potential conflict of interest is subsequently reviewed and managed by the Reviewer(s)⁵, the outcomes of which are documented on **Part B** of the **Declaration of Interest form** in Appendix 1. In the course of considering cases of potential, actual or perceived conflicts of interest, the Reviewer may consult with and seek guidance from, for example, the Head of Discipline/School/TRI/Unit who in turn may consult with, for example, and as appropriate, the Faculty Dean, Vice-Provost/Chief Academic Officer, Chief Financial Officer, Chief Operating Officer, Secretary to the College/Director of Governance, Dean of Research, Chief Innovation and Enterprise Officer or any other relevant College Officer or employee at an appropriate level of seniority and with the relevant expertise.

6.3.1 Reviewing the Disclosure

On receipt of a written disclosure of a conflict of interest (as a completed Part A of the Declaration of Interest Form), the appropriate Reviewer(s) will take the following steps:

- (i) Arrange to discuss the issue with the individual(s) who has made the disclosure as soon as is reasonably practicable.
- (ii) If necessary, consult on the issue with other relevant employee(s) at a level of seniority and expertise appropriate to address the issue (e.g. Head of Discipline/School/TRI/Unit, College Officer, etc.).
- (iii) Having discussed the issue with the individual(s) who has made the disclosure and consulted appropriately, the Reviewer determines if a conflict of interest exists.
- (iv) Having taken the steps in (i) to (iii) above, if it is determined that a conflict of interest does not exist, the individual should be notified accordingly and the decision recorded on Part B of the Declaration of Interest Form. When completed, Part B of the form should be signed by the Reviewer and countersigned by the Head of School/TRI/Unit/College Officer as appropriate, and a copy provided to the individual, see section 6.4 for further details.
- (v) Having taken the steps in (i) to (iii) above, if it is determined that a conflict of interest does exist, action will be taken to manage the conflict as set out in section 6.3.2 below

⁵ Defined in section 5 as 'The person to whom the conflict of interest has been disclosed.' As set out in section 6.2, there may be instances where there is more than one reviewer for specific activities.



and the individual should be notified accordingly and the decision recorded on Part B of the Declaration of Interest Form.

When completed, Part B of the form should be signed by the Reviewer and countersigned by the Head of School/TRI/Unit/College Officer as appropriate, and a copy provided to the individual, see section 6.4 for further details.

6.3.2 Managing a Conflict of Interest

Where it is determined that a conflict of interest exists, the Reviewer(s) must record the outcome on Part B of the Declaration of Interest form and prepare a conflict management plan which sets out how the conflict of interest is to be managed, which should also be documented on Part B of the form.

As part of the management plan conflict management measures may be put in place as necessary to avoid or mitigate any potential conflict. The management plan may include (but is not limited to):

- declaring the potential, actual or perceived conflict of interest but taking no further action;
- enquiring as to whether all affected parties will consent to the conflicted person's involvement;
- seeking a formal exemption to allow participation (if such a legal power applies);
- imposing additional oversight or review over the person with the conflict;
- refraining from examining, supervising or advocating on behalf of a student where a personal relationship exists;
- withdrawing from discussing or voting on a particular item of business at a meeting;
- absenting oneself from any meetings or discussions in relation to a student where a personal relationship exists;
- exclusion from a committee or working group dealing with the issue;
- re-assigning certain tasks or duties to another person;
- agreement or direction not to do something;
- withholding certain confidential information, or placing restrictions on access to information;
- transferring the person (temporarily or permanently) to another position or project;
- relinquishing the private interest;
- temporarily suspending the conflicting activity until the matter has been resolved;
- declining to enter into a contract with a third party;
- replacing the conflicted individual with another to deal with the activity from which the conflict has arisen.

6.3.2.1 Appealing the Proposed Management of a Conflict of Interest

An individual may raise an appeal to the proposed management of the conflict through the University's Grievance Procedure or other such University procedure as applicable and available to the individual.



Where an appeal is raised, any action may be suspended until the outcome of the Grievance Procedure or other such available University procedure is determined. Individuals will desist from engaging in the related activity pending the outcome of the Grievance Procedure or other such University procedure. Failure to do so may constitute a breach of this Policy.

6.4 Recording and Reporting on Conflicts of Interest

6.4.1 Recording Conflicts of Interest

The Reviewer(s) will provide the individual with a copy of the completed form of which Part B will record the decision made, including where the decision is that no action is required. The Reviewer(s) will sign the form and it will be countersigned by the Head of School/TRI/Unit/College Officer, as appropriate. The individual will then sign the form to indicate agreement with and acknowledgement of the decision.

A file, electronic or otherwise, of copies of signed declaration forms will be kept in the School/TRI/Unit in which the declaration has been submitted, and held in accordance with the Records Management Policy, so that there is a written record that the conflict was reported and describing how the conflict was dealt with.

6.4.2 Reporting on Conflicts of Interest

Annually in October, each School/TRI/Unit in which declarations of interest have been submitted during the preceding financial year (1 October to 30 September) will produce a summary report, using the template provided in Appendix 2, listing all Declarations of Interest submitted during that calendar year and highlighting how actual conflicts of interest identified were managed. Summary reports will be submitted to the Secretary to the College/Director of Governance at secretary@tcd.ie who will prepare a high-level summary of all recorded conflicts of interest and the management mechanisms put in place which will be presented annually to the Risk and Compliance Committee and to the Board in December for the preceding financial year, for noting and approving.

6.5 Confidentiality and Data Protection

The confidentiality of declarations of conflicts of interest will be respected. The information disclosed in declarations will only be shared with those with a need to know in order for them to carry out their functions in relation to the review, management and reporting of the notification; in such instances, the confidentiality of declarations will still be respected. In accordance with the Data Protection Act⁶, all personal data must be processed in accordance with applicable data protection law. This includes, *inter alia*, the [Data Protection Acts 1988-2018](#) and [EU General Data Protection Regulation \(GDPR\) 2016](#). Under the Act⁷, any personal data that is manifestly not relevant to the handling of a declaration should not be collected, or if it is collected accidentally should be deleted without delay.

⁶ Per section 16B of the Act.

⁷ Per section 16B(8) of the Act.



6.6 Freedom of Information

Conflicts of interest may be subject to disclosure under the Freedom of Information Act 2014 if there is a statutory obligation for the College to release information under the Ethics in Public Office Act 1995 and the Standards in Public Office Act 2001, or in line with guidelines issued by the Standards Commission. All Freedom of Information requests are considered on a case-by-case basis and the Act contains provisions to prevent the release of, for example, personal information or commercially sensitive information.

7. 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 Trinity's disciplinary procedures (or equivalent) being activated.

8. Policy Owner

The owner of this policy is the Secretary to the College/Director of Governance.

9. Responsibility and Implementation

It is the shared responsibility of each individual within the scope of this policy to identify and self-declare any actual, perceived or potential conflicts of interest, whether financial, beneficial, personal, ethical, legal, or other, so that this does not become a complicating or actionable issue.

Operational responsibility for the review and management of actual, perceived or potential conflicts of interest is a line-management issue. This means that disclosure in the first instance should be to the relevant individual's line manager or equivalent person as outlined in section 6.2 of this policy.

10. Related Documents

Legislation

- [Universities Act 1997](#)
- [HEA Amendment Act 2022](#)
- [Ethics in Public Office Act 1995](#)
- [Standards in Public Office Act 2001](#)
- [Companies Act 2014](#)
- [Freedom of Information Act 2014](#)
- [Data Protection Acts 1988-2018](#) and [EU General Data Protection Regulation \(GDPR\) 2016](#)
- [S.I. No. 284/2016 – European Union \(Award of Public Authority Contracts\) Regulation 2016, Article 24](#)



Codes and Statutes

- [Code of Practice for the Governance of State Bodies, 2016](#)
- [The 2010 Consolidated Statutes of Trinity College Dublin and of the University of Dublin](#)
- [Trinity College Dublin Code of Conduct for Members of the Board and Principal Committees of Board](#)
- [Trinity College Dublin Code of Conduct for Employees](#)

Policies

- [Academic Freedom Policy](#)
- [Consultancy and Outside Earnings Policy](#)
- [Ethics Policy](#)
- [External Examiner Policy – Research Programmes](#)
- [External Examiner Policy – Taught Programmes](#)
- [Fitness to Practise Policy](#)
- [Procedure for Conduct of Focus Groups for Student Feedback on Modules and Programmes](#)
- [Policy, Practice and Regulations on Intellectual Property](#)
- [Non-Audit Services Policy](#)
- [Non-EU Collaborative and Transnational Education Partnerships Policy](#)
- [Policy on Good Research Practice](#)
- [Council Guidance on Nominating Committees – Lecturer Appointments](#)
- [Human Resources Recruitment Policy](#)
- [Sports Sponsorship Policy](#)
- [Policy and Procedure for University Sponsorship of Clinical Trials and Studies](#)
- [Trinity Procurement Policy & Procedures](#)
- [Policy on Trinity Research Institutes: Formation, Oversight, Operation and Financial Arrangements](#)

11. Document/version Control for New Policies

Approved by: Board

Date policy approved: 25 March 2026

Date of next review: 2028/29

Officer responsible for review: Secretary to the College/Director of Governance



APPENDIX 1 – Declaration of Conflict of Interest Form

Declaration of Conflict of Interest

The Conflict of Interest Policy should be read in full before this form is completed.

Part A: Declaration of Interest

Name	
Position	
Discipline/School/Unit/TRI	
Contact Details (email and phone)	
Type of Conflict of Interest	[Whether actual, perceived or potential conflict of interest. See section 5 of the Conflict of Interest Policy for definitions]
Conflict of Interest Details	[Describe the nature of the interest(s) which may be in conflict with the interests of Trinity]
Parties Involved	[Please list all individuals who are party to the conflict]
Date when the Conflict of Interest was identified	[Please provide the date on which you became aware of the conflict]
Potential Benefit	[Please set out the benefit which might accrue to you (or a Connected Person) should the conflict go unmanaged]

Declaration:

I confirm the above is correct and that I have no additional activities, responsibilities or ownership entitlements that should be declared in relation to the above conflict of interest details.

Name	
Signature (electronic acceptable)	
Date	

Part B: Declaration of Interest Review

Date of Review	
Name of Reviewer(s)	
Position of Reviewer(s)	
Summary of the Discussion	[Summary of the discussion with the individual making the declaration]
Outcome of the Discussion	[Does a conflict of interest exist?]



Actions Taken	[Plan on how to avoid/mitigate the actual, perceived or potential conflict of interest. See section 6.3.2 of the Conflict of Interest Policy.]
Signature of Reviewer(s) (electronic acceptable) (Repeat if more than one Reviewer)	Signature Date:
Name and Signature of Head of School/TRI/Unit/College Officer (electronic acceptable)	Name Position Signature Date:
Agreed and Acknowledged by (person making the declaration) (electronic acceptable)	Signature Date:

A copy of this form is to be kept in the School/TRI/Unit/Procurement in a 'Conflicts of Interest' folder, electronic or otherwise in accordance with the [Records Management Policy](#).

Annually in October, using the template in Appendix 2 of the Conflict of Interest Policy, a summary report for the preceding financial year (1 October to 30 September) of any declared conflicts of interest and the management mechanisms put in place, is to be submitted to the Secretary to the College/Director of Governance at secretary@tcd.ie who will present a summary report to the College Board.



APPENDIX 2 – Summary Conflicts of Interest Report Template

Summary Report on Conflicts of Interest

1. Summary Information

Financial Year (1 October to 31 September)	20xx to 20xx
School / TRI / Unit	
Total Number of Conflicts of Interest Declared	
Total Number of Conflicts of Interest Identified	
Total Number of Conflicts of Interest found not to exist	

2. Details

Review Date	
Resolution Date	
Name of School / TRI / Unit	
Type of Conflict of Interest	[Actual, Perceived, Potential]
Nature of the interest disclosed	[Summary of the issue disclosed – please avoid using names of parties involved]
Conflict of Interest Identified?	Y / N If Y, proceed to next line.
Action(s) Taken to Mitigate/Avoid the Conflict of Interest (if none taken, please state)	

Please copy and paste the above table for every conflict of interest declared during the calendar year in question.

Author of Report	
Signature of Head of School/TRI/Unit/College Officer (electronic acceptable)	Name Position Signature
Date	

PLEASE SUBMIT COMPLETED REPORT IN OCTOBER TO THE SECRETARY TO THE COLLEGE/DIRECTOR OF GOVERNANCE AT secretary@tcd.ie



APPENDIX 3 – Flowchart of Declaration of Interest Process

