

Nahrein Network

Disclosure of conflict and declaration of interest policy

1. Background and context

Members of the Nahrein Network's Management Committee (NNMC), because they are active members of the research community, will almost certainly find themselves in the position of having a conflict of interest at some stage during their service on the Committee. This is often through circumstances entirely beyond their control or which could not be foreseen. Conflicts of interest are not discouraged and recognising a conflict of interest doesn't imply improper conduct or lack of integrity. It is, however, important that:

- conflicts of interest (actual, potential or perceived) are always disclosed;
- a conflict of interest management plan is put in place to prevent damage to the reputation of the NNMC member in question, or the Network as a whole;
- where conflicts cannot be managed the activity giving rise to the conflict is prohibited.

As an institution in receipt of public and other funds, a university has a duty to fulfil the highest standards of corporate governance. UCL is therefore committed to the accepted principles of public life, which embrace selflessness, integrity, objectivity, accountability, openness, honesty and leadership. UCL has therefore developed Disclosure of Conflict and Declaration of Interest Policy, which is consistent with and supports this commitment. This document is based on that Policy.

Ensuring that conflicts of interest do not result in decisions or actions that can be called into question is important in order to protect UCL's reputation and its charitable status, as well as the Network's reputation and income.

2. Scope

- This policy applies to all members of NNMC who are not also employees or honorary research fellows of UCL.
- Employees and honorary research Fellows of UCL are bound by UCL's Disclosure of Conflict and Declaration of Interest Policy, on which this document is based.

3. Purpose and Principles

- The purpose of this Policy is to provide NNMC members with the information required for appropriate awareness of issues, to be able to recognise perceived, potential or actual conflicts, and to manage them effectively should they occur. This policy encourages the disclosure and management of conflicts.

- This Policy aims to ensure that:
 - any actual, perceived or potential conflicts of interest, whether financial or non-financial and whether arising from external activities, personal relationships or roles within the Nahrein Network, are identified and properly managed in compliance with the relevant professional, legal, ethical and regulatory standards on conflicts of interest so that the activity can be carried out without risk to the integrity or the reputation of the Network or its members;
 - activity is avoided in cases where a conflict of interest cannot be appropriately managed;
 - all NNMC members are aware of the importance of proper management of conflicts of interest and are transparent about any potential conflicts;
 - there is a transparent and accurate record of the external interests of NNMC members;
 - there is an effective procedure for identifying, recording and managing disclosed conflicts of interest as and when they arise, and that management plans are implemented and adhered to where required.

4. The nature of conflicts

- A conflict can occur when the duties owed to the Nahrein Network by NNMC members compete with their personal interests, personal relationships or duties to others. This can include situations where the commitments and obligations owed by NNMC members to the Nahrein Network or to other organisations, are likely to be compromised, or may appear to be compromised, by:
 - personal gain, or gain to immediate family (or a person with whom the staff or student has a close personal relationship), whether financial or otherwise; or
 - the commitments and obligations that person owes to another person or organisation.
- A conflict can be actual, potential or perceived. A perceived conflict of interest is one which a reasonable person would consider likely to compromise objectivity. A potential conflict of interest is a situation which could develop into an actual or perceived conflict of interest.
- Conflicts of interest may be financial or non-financial or both.
- A conflict of interest or a potential conflict of interest does not arise merely because an NNMC member has academic or commercial interests outside the Nahrein Network and this policy is not intended to discourage the development of such interests.

- Conflicts must be disclosed, following the process and principles of this Policy.

5. Roles and responsibilities

- Nahrein Network Management Committee members
 - NNMC members are responsible for ensuring that they comply at all times with this Policy, and act in a transparent way that is consistent with the principles of public life. Each individual is responsible for recognising situations in which they have a conflict of interest, or potential conflict of interest, or might reasonably be seen by others to have a conflict, to disclose that conflict in accordance with section 6 and to take such further steps as may be appropriate as set out in more detail in section 7 below.
- Administrator of the Nahrein Network:
 - ensuring that all NNMC members are aware of and comply with this Policy;
 - ensuring appropriate plans for managing conflicts of interest disclosed are agreed with the relevant individual (section 6 below).
- Director of the Nahrein Network
 - The Director is the owner of this Policy. The Provost may convene a committee of relevant individuals (a “Conflict of Interest Committee”) as required, to which unresolved matters relating to conflicts of interest can be referred.
 - The Director may delegate all or any of management, oversight and review of this Policy to an identified Co-Director or equivalent.

6. Disclosure of conflicts of interest

- NNMC members should make a conflict of interest disclosure **as soon as there is a risk that a conflict or potential conflict of interest might arise** or it is recognised that a conflict might be perceived. Disclosure may be made orally at a NNMC meeting, or in writing to the Administrator.
- The Director of the Network, or a delegated Co-Director, will be responsible for determining whether a conflict needs to be actively managed by the implementation of an appropriate conflict management plan and recording the relevant Conflict Management Plan in the Network’s record.

7. Management of disclosed conflicts of interest

- Some instances of conflict will require more than just disclosure, and will need to be addressed by agreeing how the conflict can be actively managed, through a Conflict

Management Plan. In cases where there is an actual conflict of interest (as opposed to a potential conflict of interest) it may not be possible to manage that conflict. In these circumstances the NNMC member is required to remove themselves from relevant decision making processes in the Network. If for any reason they consider this is not possible or not appropriate they are required to seek further guidance from the Director of the Network.

- NNMC members are required to comply with any relevant Conflict Management Plan and failure to comply may result in removal from the NNMC.
- Any member of the Network who is concerned that an NNMC member may have an undisclosed conflict should raise this with the Director, Administrator, or any Co-Director of the Network.

8. Ongoing review of the Disclosure of Conflict and Declaration of Interest Policy

- This Policy shall be the subject of regular review by the Director's team, with updates reported to and agreed by NNMC.
- Such reviews will take place in the light of guidance on best practice issued by UCL and are to take place at least once every three years.

9. Non-compliance

- Non-compliance with this policy may result in removal from the NNMC.

Appendix 1: Types of Personal Interest

Conflicts of interest may be financial or non-financial or both.

Financial interest refers to anything of non-trivial monetary value, including, but not limited to, pay, commission, consultancy fees, equity interests, forgiveness of debt, property, royalties, and intellectual property rights.

Non-financial interest refers to any non-financial benefit or advantage, including, but not limited to, enhancement of an individual's career, education or professional reputation; access to privileged information or facilities.

Potential conflicts could arise through NNMC members, their immediate family (or people with whom the NNMC member has a close personal relationship) having:

- **Business positions** (e.g. Executive and non-Executive Directorships; partnerships; ancillary employment in other businesses)
- **Appointments** (e.g. Trustee in charitable organisation; appointment with a funding body or in other organisations)

- **Consultancies**
- **Investments** (e.g. Shareholdings (including spin out companies) or beneficial interests in shareholdings; Trusts/nominee companies; Other assets or significant sources of income)
- **Gifts** (e.g. reportable gifts such as substantial travel, hospitality or other forms of valuable benefit)
- Other personal interests which could constitute a potential conflict of interest situation

This list is not exhaustive, and other situations could constitute potential conflicts.

Appendix 2: Conflict Management Plan

Some disclosed conflicts will require a Conflict Management Plan to be put in place. This should be developed by the Administrator of the Network and the Discloser. Once it has been agreed, the relevant Conflict Management Plan will need to be approved by the Director of the Network.

There are several strategies that may be appropriate to a Disclosed Conflicts Management Plan, such as (but not limited to):

- not taking part in discussions of certain matters;
- not taking part in decisions in relation to certain matters;
- referring to others certain matters for decision;
- resolving not to act as a particular person's supervisor;
- divesting or placing in trust certain financial interests;
- publishing a notice of interest;
- standing aside from any involvement in a particular project; and/or
- declaring an interest to a sponsor or third party.

In most cases where there is an actual conflict of interest, the decision-maker who has a conflict of interest will need to stand aside from taking the relevant decision.

The Administrator or Director may determine that the only way to manage a conflict of interest is for the situation giving rise to the conflict to be avoided.

A Conflict Management Plan will include review dates, options and responsibilities.

A Conflict Management Plan will be retained on the Network's confidential SharePoint system. Evidence of completion of identified reviews, any required amendment to the plans etc. will be retained and recorded in the same manner.