



Policy and Procedure on Conflict of Interest

	Policy
	Executive Team
	December 2022
	December 2023

3.



PURPOSE AND OVERVIEW

2.1 As part of LSHTM's values, LSHTM is fully committed to ensuring the highest levels of integrity apply in all the School's activities, ensuring compliance with relevant legal regulatory requirements, as well as supporting its commitment to uphold the Office for Students' public interest principles.

2.2 Acknowledging members of the LSHTM community may have various interests beyond their involvement with the School, the purpose of this policy is threefold:

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- (i) A Conflict of Interest will be financial in cases such as when there appears to be an opportunity for personal financial gain, whether directly or to someone with a Close Personal Relation to the individual, or in instances in which it might be reasonable to take the view that financial benefits may affect a person's actions. For the purposes of this section, a Close Personal Relation is defined as a financial, family or sexual relationship or a relationship that involves a degree of intimacy beyond that normally present between members of staff with students, work colleagues or other members of the community.
- (ii) A non-financial Conflict of Interest concerns actual, perceived or potential benefits or advantages, direct or indirect, to an individual affected by this policy, someone with a Close Personal Relation or a connected person.

3.5.2 The following situations are likely to result in a Conflict of Interest:

- (i) contractual or legal obligations, such as obligations to business partners, clients, suppliers, employers, employees or similar;
- (ii) loyalty to family, partners and friends;
- (iii) Fiduciary duties to a third party;
- (iv) Professional duties resulting from other obligations, which could result in LSHTM's commitments not being sufficiently prioritised;
- (v) Business or financial interests.

3.6 Conflicts of Interest may arise when dealing with external parties to the School, but also in internal activities, and they can happen in all kinds of fields, such as recruitment and promotions, procurement, funding or conducting research, teaching, students admissions and contractor selection, among others.

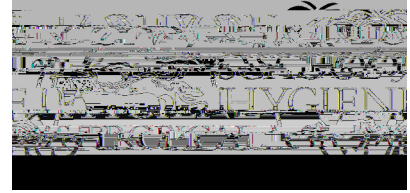
WHEN TO DECLARE A CONFLICT OF INTEREST

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member), the corresponding individuals detailed in Section 6.5 below, the Secretary and the Head of Legal and Compliance, as the case may be.

- 6.5 In some instances, a Conflict of Interest may concern specific activities. If the activities concerned are listed below, the Conflict Manager must obtain input from specific teams in order to make a decision on actions, and to take their input into account when making the corresponding decision, keeping a record of their advice:
- (i) For recruitment, promotions or disciplinary activities, the Director of Human Resources;
 - (ii) For Committee membership, the Head of Governance and Planning;
 - (iii) For research activities, the Head of Research Governance and Integrity;
 - (iv) For education, including assessment and examinations, the Pro-Director of Education;
 - (v) For admissions, the Head of Registry;
 - (vi) For commercial relations, the Director of Finance;
 - (vii) For any forms of exploitation or licensing of intellectual property, the Head of Tech Transfer, Consultancy and IP.
- 6.6 Any of the individuals mentioned in Section 6.4 above may formally delegate this involvement to another individual.
- 6.7 In the event of a Conflict of Interest being declared ahead of or during a meeting, the Conflict Manager may decide among the following options:
- (i) For the meeting to go ahead with full unrestricted participation by the individual in a position of Conflict of Interest;
 - (ii) For the individual to remain in the meeting where the Conflict of Interest is considered, not participating in the relevant discussions;
 - (iii) For the individual in a position of Conflict of Interest to withdraw from the decision making process the Conflict of Interest concerns;
 - (iv) For the individual to withdraw entirely from the particular meeting group, if the Conflict of Interest is expected to be significant or ongoing for its business;
 - (v) To postpone any matters related to the Conflict of Interest to a later meeting, in order to obtain further details or seek for specific advice.
- 6.8 When determining the measures to be put in place in order to suppress the impact of a Conflict of Interest, the Conflict Manager will take into account:
- (i) The seriousness of the Conflict of Interest;
 - (ii) In the event of a potential Conflict of Interest, the likelihood of the event taking place and potential mitigations to reduce this likelihood;
 - (iii) The closeness of the interests at stake (LSHTM's and conflicting ones), and the actual and potential magnitude of their effect on each other;
 - (iv) The nature and importance of the decision and activities impacted by the Conflict of Interest;



- (v) The likelihood and extent to which the conflicting interests could affect or be perceived to affect the School's decisions;
- (vi) The nature and level of involvement the individual will have in the relevant decision or activity.

6.9 To the extent permitted by Law, declarations of Conflicts of Interest will be treated confidentially.

OUTCOMES

- 7.1 Subject to Section 6.4 above, if having reviewed a declaration of interest, the Conflict Manager is satisfied that no further actions are required, they shall, directly or through a nominated delegated representative, inform the individual, briefly outlining why the decision has been made, and, including in the correspondence doi@lshtm.ac.uk, an email address monitored by the Legal team, for compliance and record-keeping purposes.
- 7.2 If the Conflict Manager determines that a Conflict of Interest does exist, the individual shall be informed, including in that correspondence doi@lshtm.ac.uk. The notice will include detail on what the appropriate resolution is, among the following:
- (i) No further action is needed ;
 - (ii) Restrictions (such as additional approvals) or additional oversight (such as the appointment of an alternative Principal Investigator) must be applied;
 - (iii) Withdrawing from the particular project, task or matter is required;
 - (iv) Certain tasks, such as line management, must be reallocated to a colleague;
 - (v) All involvement in the particular project, task or matter by the individual must cease immediately.
- 7.3 Any outcome notification under Sections 7.1 and 7.2 above will also include:
- (i) An outline of any discussions between the individual and the Conflict Manager;
 - (ii) Details of the actions agreed to manage the Conflict of Interest in the best

APPENDICES





