

Conflict of Interest Management Options

A conflict of interest management option is a strategy or action taken to mitigate, reduce, or eliminate conflicts of interest that have been disclosed. The appropriate management option(s) will depend on the outcome of the risk assessment.

Unless the risk is insignificant, some form of management will be required. The below options should not be considered in isolation and a mix of responses may be appropriate.

TAKE NO FURTHER ACTION	
This management option is acceptable only where the risk is determined to be insignificant (in accordance with the University's Risk Management Framework and the COI Risk Assessment template).	
RECORD	<ul style="list-style-type: none"> ▪ Even where it is decided that no further action is needed, documentation is required (i.e. a Brief Conflict of Interest Management Plan) to indicate the reasons why this strategy is appropriate.
CHANGE THE PERSON'S RELEVANT ACTIVITIES	
Changing the conflicted staff member's relevant activities can be done by reducing or amending their involvement and/or influence.	
REMOVE	<ul style="list-style-type: none"> ▪ Often, the most effective way to manage a conflict of interest is to remove the conflicted staff member from involvement in the matter.
RESTRICT	<ul style="list-style-type: none"> ▪ Where removal from a matter is not practical, consider reducing or amending the staff member's involvement. This may involve: <ul style="list-style-type: none"> ○ limiting involvement to certain aspects of the process/activity/research ○ segregating or reducing their duties ○ reducing their seniority in the specific matter ○ providing greater supervision ○ excluding them from certain discussions or meetings ○ placing them in an advisory role with no decision-making authority or financial delegations ○ preventing them dealing with external stakeholders (e.g. tenderers) ○ changing their reporting lines ○ excluding them from official record keeping roles ○ limiting or removing access to information/records/systems ○ ensuring a staff member of equal or greater seniority is involved in the matter
RECRUIT OR REALLOCATE	<ul style="list-style-type: none"> ▪ Even if they have little or no formal involvement, the conflicted staff member may still have substantial influence over a matter (e.g. they may be in a position to persuade colleagues or have access to relevant information. Some techniques for reducing the influence of a conflicted person include: <ul style="list-style-type: none"> ○ engaging an independent expert / third party to participate in, re-do, oversee or review and report on the integrity of the decision-making process or transaction ○ engaging a peer or subject matter expert to review the work of the conflicted person ○ transferring the matter to another business unit or team that is not connected with the conflicted person ○ transferring the conflicted person to another project or team (temporarily or permanently) ○ creating a physical separation between the conflicted person and decision-makers
RESIGN	<ul style="list-style-type: none"> ▪ Resignation by the conflicted person from the University (or terminating a relationship with the University) may need to be considered if the conflict of interest cannot be managed or cannot be managed according to the agreed management plan.

CHANGE THE PERSON'S PERSONAL INTEREST	
It may be appropriate for the conflicted staff member to modify the nature of their personal interest in some way.	
RELINQUISH	<ul style="list-style-type: none"> ▪ Generally, a negotiation with the person should occur to come to an agreement regarding how the personal interest may be changed. ▪ Considerations for changing the personal interest may include the person: <ul style="list-style-type: none"> ○ disposing of a pecuniary interest (e.g. shares) ○ relinquishing ownership of an asset ○ resigning a directorship or membership ○ refraining from communicating with a particular person during the process (for non-pecuniary interests). ▪ No one can or should be forced to give up a personal interest. It is up to the staff member to decide whether their work commitments outweigh the attachment to the personal interest and to work with the conflict of interest manager to apply the appropriate management strategy.

CHANGE THE SYSTEM OR PROCESS	
Without changing the staff member's activities or their private interest/s, it is usually feasible to strengthen controls and the overall probity of the process.	
REDESIGN	<ul style="list-style-type: none"> ▪ Generally, where this management option is chosen the change should increase or strengthen controls and probity of the process, such as stronger record keeping, additional monitoring or assurance. Examples include: <ul style="list-style-type: none"> ○ requiring more detailed documentation about aspects of the matter ○ redesigning the decision-making or approval process to reduce subjectivity/discretion ○ documenting reasons for decisions that are taken ○ creating audio or video recordings of key decisions or meetings ○ maintaining audit and access logs ○ conducting a post-completion review ○ enhancing controls to protect information from unauthorised access/use/disclosure ○ establishing internal controls to identify deviations from the process ○ appointing probity checkers, advisors or auditors ○ inform other relevant people about the conflict and instruct them on how to meet probity requirements ○ providing additional training and awareness raising sessions. ▪ For research, this may also involve not proceeding with the research project. This decision should be approved by the DVCRI.

FOR ALL MANAGEMENT OPTIONS	
Just as a conflict of interest declaration must be in writing, so must the management response.	
RECORD	<ul style="list-style-type: none"> ▪ The management option(s) must be documented (i.e. in a Conflict of Interest Management Plan) to record the decision taken. ▪ For research, this may also involve publicly disclosing the conflict of interest: <ul style="list-style-type: none"> ○ in presentations and publications ○ to collaborators ○ to study participants.
REFER	<ul style="list-style-type: none"> ▪ There may be a requirement to disclose the conflict to a funding body, research or industry partner, or ethics committee, in accordance with the terms of funding agreements, research grants or other contractual requirements.