

POLICY ON CONFLICTS AND EXTERNAL WORK

Purpose

This document sets out the policy and procedures of Cork Institute of Technology for the identification, disclosure and management of conflicts.

Scope

This policy applies to all members of staff, members of Governing Body and external parties involved in the activities of the Institute.

It has been amended and expanded from the original version of the Policy approved in 2015, which related solely to the Institute's academic activities, in light of the 2017 *Review of IP Management and Conflicts of Interest* commissioned by the HEA and Knowledge Transfer Ireland, which includes the following as one of its Key Recommendations:

'Dedicated conflict of interest policy: Every HEI should have a single Conflict of Interest policy which is easily and publicly available on their website, regularly reviewed, and approved by the Governing Body. This should include reference to actual and potential for conflicts relating to IP commercialisation and their management and should point to the detailed information and processes outlined in the HEI IP policy which are designed to mitigate many such conflicts.'

It is intended to complement the existing policies and procedures of the Institute including, in particular, the Code of Governance for Institutes of Technology as adopted by the CIT Governing Body in 2018, the Code of Conduct for Employees, the Code of Conduct for Members of Governing Body, Intellectual Property Policy, and the guidelines and procedures of the CIT Human Resources Office regarding external work (see section 4 below and Appendix 5 for further details in relation to external work) .

The policy should be read in conjunction with the Ethics in Public Office Act, 1995, the Standards in Public Office Act, 2001, and any related guidelines published by the Standards Commission from time to time. Adherence to this policy does not absolve members of CIT and external parties from any obligations they may have under the Acts or any other pertinent legislation.

Interpretation

Engagement in external activities may give rise to two types of conflict: Conflicts of commitment, which are generally understood as conflicts which may affect the allocation of time and energy; and conflicts of interest, which may affect professional judgment.

A 'conflict of interest' arises when an individual holds a personal interest, whether direct or indirect, which in the opinion of a reasonably-informed and well-advised person is sufficient

to call into question the independence, impartiality and objectivity the individual is obliged to exercise in the performance of his/her duties. Conflicts of interest may be financial or non-financial or both.

General examples of conflicts of interest, as well as examples specific to certain areas within the Institute including academic activities and intellectual property commercialisation, are set out in Appendix 1 to this policy.

The interpretation of conflict of interest in this document encompasses actual, potential and perceived conflicts: “[A] conflict of interest exists whether or not decisions are actually affected by a personal interest; [it] implies only the potential for bias, not a likelihood.”¹ Individuals may not always be conscious of the effects of a conflict of interest on their own judgment². A conflict of interest may be presumed where it may reasonably appear to an independent observer with knowledge of the relevant facts that the professional decisions or actions of an individual acting on behalf of CIT may be determined by a secondary, outside interest (be it financial or personal gain, professional advantage, intellectual bias, or any other interest)³.

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.

In many instances, the exercise of individual discretion to identify and disclose a conflict sufficiently minimises perceived bias and reputational risk to make further corrective or preventative action unnecessary.⁴

A ‘conflict of commitment’ occurs when the commitment to external activities of a staff member adversely affects his or her capacity to meet Institute responsibilities. This form of conflict may be recognised by a perceptible reduction of time and energy devoted by the individual to Institute activities. Conflicts of commitment primarily involve questions of obligation and effort, but are often tied to financial remuneration or other inducements and in such cases they may also constitute a conflict of interest. Therefore, the terms ‘conflict’ and ‘conflict of interest’ in this policy should also be read as including conflicts of commitment.

Good Practice Guidelines

¹ Columbia Center for New Media Teaching and Learning, Responsible Conduct in Research, Conflicts of Interest, 1.1, http://ccnmtl.columbia.edu/projects/rcr/rcr_conflicts/foundation/#1

² American Association of University Professors, Statement on Conflicts of Interest, revised version November 2013, <http://www.aaup.org/report/statement-conflicts-interest>

³ Ibid.

⁴ See also University of Southern California, Policy on Conflict of Interest in Research, Section 1, March 2013, <http://policy.usc.edu/research-conflict-interest/>

Good practice guidelines for avoidance of conflicts of interest specifically in the appointment of external examiners for taught or research programmes and review panel members are given in Appendices 2 – 4 of this policy.

External appointees to these functions are referred to the relevant Appendix for initial guidance on the most significant conflict of interest issues pertinent to their specific role.

Policy

1. Context

The maintenance of public confidence in the Institute requires that Institute employees, members of Governing Body, as well as external contributors engaged in its activities, perform their duties with integrity and proper professional judgment, aspiring to the highest ethical, professional and academic standards. At the same time, in an outward-facing academic and research environment which seeks to foster two-way engagement, knowledge exchange and collaboration with a wide range of external partners, it is neither possible nor desirable to forestall all activities and engagements which may at one point or another give rise to a conflict, whether actual or apparent.

The following section sets out the general principles for addressing conflict of interest in the Institute. Section 3 discusses these in greater detail and sets out procedures for disclosure and management of conflicts.

2. General Principles

The following principles guide the Institute's approach to conflicts:

2.1 Basic Principle

Staff of the Institute and any other individuals engaged in CIT activities should not enter into situations which may give rise to any conflict with regard to their obligations to CIT.

2.2 Disclosure

Conflicts should be disclosed promptly and fully. Responsibility for disclosure lies first and foremost with the individual whose outside interests/activities give rise to the conflict.

2.3 Management

Upon disclosure the Institute will review the circumstances and decide on an appropriate course of action for managing the conflict. In many cases, full and prompt disclosure will be the only measure required to manage the conflict. The conflict will also be recorded on the Institute's Conflicts Register.

2.4 Discontinuation

In cases where a conflict of interest cannot be managed, the Institute activity affected must not commence, or current arrangements must be discontinued where an activity is ongoing.

3. Procedure

3.1 Evaluation and Arrangement of Interests

Individuals should evaluate their interests for sources of potential conflict before they initiate an activity. They should also be alert to conflicts which may arise when circumstances change in the course of ongoing activities.

Wherever possible, activities which may compromise an individual's ability to exercise sound and unbiased judgment should be arranged so as to wholly avoid or resolve the conflict. Where this cannot be achieved, for example because the conflict arises from a past engagement, the conflict must be disclosed.

Since apparent conflicts may be as damaging as actual ones, whenever an individual is in doubt as to the existence of a conflict, the relevant circumstances should be disclosed.

3.2 Disclosure

Prompt and full formal disclosure should be made prior to the commencement of any new activity or commitment which may be, or may appear to be, affected by a conflict. Disclosure of the circumstances surrounding the conflict should be detailed enough to permit an informed, accurate and objective evaluation.

In cases where a conflict emerges or arises in the course of an ongoing commitment, the conflict should be disclosed as soon as it is identified.

Disclosures should be made as well as received, recorded, and referred onwards with all due regard for the professional and personal integrity of all involved and the rights of the individual regarding privacy and confidentiality of personal information.

Conflicts Involving Members of Governing Body:

Disclosure should be made to the Chair of Governing Body in the first instance and recorded by the Secretary of Governing Body. Where the Chair may have a potential conflict s/he should make a declaration to the Secretary of Governing Body.

An appropriate form for making such a disclosure will be available from the Secretary of Governing Body.

Conflicts Involving Members of CIT Staff:

Disclosure should be made to the staff member's line manager in the first instance. Where a staff member's line manager is a party to the conflict, disclosure should be made to the next most senior person in the management chain.

An appropriate form for making such a disclosure will be available from the President's Office.

Conflicts Involving External Parties (Declaration of Interest):

Notwithstanding the fact that responsibility for disclosure lies with the individual with whom the conflict arises, CIT staff seeking to engage external parties in relation their academic activities should draw the attention of contributors to this policy, and should as a rule seek a written declaration of interest prior to confirming the engagement.

Formal declarations of interest should always be sought, prior to engagement, from external parties to activities related to examination and assessment, research projects and research degree provision, and academic quality assurance. Amongst others, this includes prospective external examiners, research supervisors, and members of academic validation and review panels.

Outside of these contexts, where it reasonably appears to the designated member of CIT staff that an intended external contribution to Institute activity – such as delivery of a guest lecture on a module – is unlikely to engender conflict for CIT, it may be decided not to seek a declaration in the first instance.

Declarations of interest in this context – whether indicating a conflict of interest, or the absence of one – should be made to the designated CIT point of contact for the external party.

Likewise, conflicts arising for external parties during ongoing Institute engagements should be disclosed to the designated CIT point of contact in the first instance.

Where warranted by the circumstances, or in case of doubt, the Institute contact receiving a disclosure should report the conflict onwards to her/his line manager, who may take a decision regarding management of the conflict, or may in turn refer the disclosure onwards to the appropriate Institute function or board.

The Institute will also seek to address conflicts with potential contractors through appropriate declarations in its tender documents.

Appearance of Conflict:

Identification and disclosure of a conflict is first and foremost the responsibility of the individual(s) whose outside interests give rise to the conflict.

Where, however, it appears to someone, based on specific factual circumstances, that another individual may have an unidentified or undisclosed conflict in relation to a CIT activity, they may notify the perceived conflict to the Institute member responsible for directing the activity (normally, a Head of Department or Function)⁵.

Upon evaluation of the reported circumstances, the CIT staff member receiving the notification may decide that no action is required at this point, may decide to approach the individual concerned with a request to assess and declare her/his outside interest(s), or may in turn refer the issue to her/his own line manager.

Advice:

⁵ Except where there may be a legal or ethical obligation to report observations made.

If a member of staff requires advice on the declaration of a conflict, and any paperwork associated with same, they may contact HR.

If a member of Governing Body requires any such advice, they may contact the Secretary of Governing Body.

3.3 Management

Following disclosure, the appropriate Institute manager will review the facts and decide on the management of the conflict.

Where the initial disclosure is deemed sufficient to avert the attendant risks or contain them within tolerable limits, no further action may be necessary.

Additional measures may include, for example, wider disclosure of the conflict within or outside of CIT, modification of the intended Institute activity or limitation of the role of the conflicted individual therein, appointment of a monitoring function (such as a second external supervisor), or a requirement to report on the conflict at set intervals to designated Institute functions.

3.4 Discontinuation

Where a conflict pertaining to a planned CIT activity cannot be managed, the activity must not commence until alternative arrangements have been put in place which remove all sources of conflict. In some cases, the intended activity may need to be abandoned altogether.

Where a conflict emerges or arises during an ongoing activity, current arrangements must likewise be promptly discontinued, and the activity suspended until suitable alternative arrangements have been implemented. In extremis, the Institute may be obliged to cease an existing activity altogether. In such a case, due regard would need to be given to all statutory obligations e.g. with regard to learner protection.

Where an unmanageable conflict involves an external party, engagement of this individual must not proceed, or must cease if the conflict is identified during an ongoing commitment. In the latter case, it may be necessary to review the overall arrangements for the activity in order to contain any risk arising from the past involvement of the contributor.

3.5 Conflicts Register

The 2017 *Review of IP Management and Conflicts of Interest* commissioned by the HEA and Knowledge Transfer Ireland includes the following as one of its Key Recommendations:

'More robust governance and management of conflict of interest: Whilst responsibility for recognising and avoiding conflicts of interest should remain with the individual, HEIs must take more responsibility at a senior level to put robust procedures in place to identify, manage and record the approach taken to avoid or manage conflicts of interest. A summary of all potential conflicts reported and management mechanisms put in place should be reviewed by the Governing Body at least annually.'

Therefore, the Institute will create a Conflicts Register to be maintained by the President's Office, which will be put before Governing Body annually by way of summary report for review. This report should have due regard to the Institute's obligations under Data Protection legislation and policy.

Once a conflict has been disclosed and steps to manage it as deemed appropriate have been identified, the manager to whom it was first disclosed should provide details of it (using the appropriate form) to the President's Office for entry on the Conflicts Register. Further updates in relation to the conflict should also be provided by the manager to whom it was first disclosed.

3.6 Non-compliance

Failure to disclose a conflict or external work, or failure to keep such disclosures accurate and up to date, or a refusal to cooperate with any measures/action to neutralise a conflict may constitute a breach of an employee's contract of employment and may result in disciplinary action under the Institute's Disciplinary Procedure.

A failure by a member of Governing Body to disclose a conflict of interest may be deemed a breach of the Code of Conduct for Members of Governing Body.

4. External Work

4.1 External work does not create a conflict in of itself, but has the potential to. All staff of the Institute are obliged to declare, and seek approval for, external work through HR, and to keep those declarations accurate and up to date. This is in addition to the obligations to declare conflicts as set out above. Further information on what constitutes external work is set out in existing guidance notes, which are repeated for ease of reference at Appendix 5 to the Policy. To date, HR has sent out reminders about external work periodically. However, such notifications will issue annually at a minimum with effect from academic year 2018/19.

The external work procedures are designed to ensure the Institute is aware of outside work commitments that may affect a person's ability to do their job in CIT, and also to manage any risk of non-compliance with legislation, such as the Organisation of Working Time Act 1997, and relevant policies, such as public sector rules re multiple sources of publicly funded pay.

An External Work Register is maintained by HR.

Taking up of external positions on the nomination of the Institute, such as directorships on boards, does not require external work approval, as the Institute will be aware of such work. However, any such nominations etc. should be made through the President's Office, where a record of them will be kept. Any individual taking up such a nomination must still have regard to the Institute's policy on conflicts as set out in this document when acting in their nominated capacity, and disclose any conflicts as they arise in that context.

5. Review

This policy shall be reviewed at intervals not exceeding two years. Responsibility for initiating the review lies with the President's Office.

Appendix 1: Examples of Conflicts

General:

- Financial interests in matters the Institute deals with. Employees may find themselves in a position in which fulfilment of their functions and duties may confer material benefits to themselves, their families, relatives or close associates.
- Personal relationships with students - staff should avoid and must disclose to the Institute any situations which may require them to supervise or assess a student with whom they have or have had a personal, commercial, familial or other significant relationship.
- Personal relationships with people the Institute is dealing with e.g. contractors or tenderers.
- Paid work for or on behalf of CIT (whether as an employee or contractor) outside the scope of an individual's primary contract with CIT that may lead to conflicts of commitment or interest.
- Secondary external employment or work that compromises the integrity of the Institute or exposes the Institute to risk or a weakening of public confidence in the Institute. Any secondary employment/work should not expose the Institute or any other party to a risk of non-compliance with public sector rules re multiple sources of publicly funded pay, the Organisation of Working Time Act 1997, Health & Safety legislation and related Institute policies, or affect the employee's ability to undertake full duties in a safe manner.

Academic Activities:

- An external examiner for a viva voce examination in a specialised research area is likely to have interacted or collaborated with some or all of the candidate's supervisors and internal examiners, but may also compete with these, and with the candidate, for publication or career advancement opportunities.
- An external academic serving on a programme approval panel may be aware that a comparable programme is in development at her/his own institution, which, even though the market may sustain both programmes, may give a significant reputational boost to the academic's home department if it were to launch first.

IP Commercialisation:

Conflicts of interest that may arise in connection with IP commercialisation include, but are not limited to, the following:

- An individual using his/her Institute position to:
 - influence a contract or other favourable terms for a company in which he/she, or a relative or friend, had a financial interest;

- obtain financial or non-financial benefits for him/herself or for a relative or friend in return for providing advantage, or potential advantage;
- use Institute resources or confidential information for personal financial or non-financial benefit, or benefit to a relative or friend.
- Conducting business, employment or activity outside of the Institute, which adversely affects the individual's ability to perform his/her duties.
- An individual compromising research objectivity or independence in return for financial or non-financial benefit for him/herself or for a relative or friend.
- A researcher having a financial interest in the company sponsoring research, this being exacerbated if the value of the researcher's interest may be affected by the outcome of the research.
- An individual is an inventor of patents or creator of other IP whose value may be affected by the outcome of research in which they are involved.
- An individual holds a position in an enterprise (e.g. as director) that may wish to restrict (or otherwise manage) adverse research findings for commercial reasons or not wish to publish the results of the research.
- An individual having a financial interest or other personal interest in a spin-out or may have personal IP with which they are intending to create a start-up company.
- An individual having a financial interest in the licensee (or proposed licensee) of Institute intellectual property.
- An individual taking part in the negotiation of a contract between the Institute and a company, where the individual or his or her family or a close personal friend has a financial or non-financial interest (e.g. a directorship) in that company.
- Where a researcher holds shares in a spin-out company, but may also be in a position to influence decisions relating to ongoing collaborative research between the Institute and the spin-out.
- Where it is proposed to license Institute technology to a company which is owned by a family member of the creator of that technology.
- Where a decision is being made on distribution of equity in a spin-out company between the Institute and creator, but the creator is part of the normal decision-making process for spin-out approval.

Appendix 2: Avoiding Conflict of Interest in the Selection of Panel Members for Academic Validation and Review Panels – Guidelines

To avoid some of the more common sources of conflict of interest in the context of academic reviews, the following principles of good practice require specific attention when recruiting panel members:

1. Panellists should not have had any previous involvement in putting together the programme under review or in writing any of the attached modules.
2. Panellists should not be in a family or other close relationship with members of the proposing or programme team.
3. Panellists should not have any other links with members of the programme team, or with other members of the Validation Panel, which may compromise, or be perceived to compromise, the proper discharge by the panellist of her/his duties.

Internal Panellists Specifically:

4. Internal panellists shall not be in a direct reporting relationship with any member of the proposing team.
5. Internal panellists should not come from the sponsoring School. Exceptions require prior sign-off from the Office of the Registrar & Vice-President for Academic Affairs.

External Panellists Specifically:

6. External panellists shall not have acted as External Examiners for any programme of the sponsoring Department within (3) years prior to the panel date.

Appendix 3: Avoiding Conflict of Interest in the Recruitment of the External Examiners for Taught Modules and Programmes – Guidelines

To avoid some of the more common sources of conflict of interest in the context of external examination, the following principles of good practice require specific attention when recruiting external examiners for CIT taught modules and programmes:

1. The External Examiner for a specific module or a group of modules within a subject stream (such as a language) should not be in a family or other close relationship with any member of the module staff, the School sponsoring the module(s), or any external organisation contributing significantly to delivery of the relevant modules (e.g. by offering work placements).
2. The External Examiner for a taught programme or group of programmes should not be in a family or other close relationship with any member of the programme staff, the School sponsoring the programme(s), or any external organisation contributing significantly to delivery of the relevant programme(s) (e.g. by offering work placements).
3. On conclusion of a period of appointment, an External Examiner shall not be reappointed in that capacity for any module or programme sponsored by the School for at least (3) consecutive academic years.

Appendix 4: Avoiding Conflict in the Recruitment of the External Examiners for Research Degree Programmes – Guidelines

To avoid some of the more common sources of conflict of interest in the context of external examination, the following principles of good practice require specific attention when recruiting external examiners for Masters' and doctoral research degree programmes:

1. The External Research Examiner shall not have acted as the candidate's internal or external supervisor.
2. The External Research Examiner should not be in a family or other close relationship with the candidate, supervisor(s), or any member of the department or research unit sponsoring or substantially contributing to the research programme.
3. The External Research Examiner should not have acted as an employer of the candidate in the past, or be aware, at the time of examination, that s/he will be an employer of the candidate in future.
4. The External Research Examiner should not have acted as an advisor to the candidate on matters directly pertinent to the research programme.
5. The External Research Examiner should not have been a staff member or student of CIT in the (5) years preceding the examination, or for the duration of the research programme if this exceeds (5) years.
6. The External Research Examiner should not normally have examined the thesis of another candidate under the same CIT supervisor(s) within (3) years preceding the date of the examination. Where there is a reasoned case for an exception on the basis of an examiner's required specialist expertise, this should be made to the Dean of Graduate Studies by the designated CIT staff member (normally, the head of CIT unit or function).
7. The External Research Examiner should not have shared authorship of a peer-reviewed publication or conference paper with either the supervisor(s) or candidate within (3) years preceding the date of the examination or since the date of first registration of the student, whichever is longer. For doctoral candidates transferred from the Masters' Register, the date of first registration refers to the date of registration on the Master's register.
8. The External Research Examiner should not normally be drawn from an institution or organisation located in Munster. Where there is a reasoned case for an exception on the basis of an examiner's required specialist expertise, this should be made to the Dean of Graduate Studies by the designated CIT staff member (normally, the head of CIT unit or function).

Appendix 5: EXTERNAL WORK GUIDANCE NOTES

Reasons to Engage in External Work

- To continually develop, expand and maintain professional competence;
- It relates to the person's academic/professional interests;
- To enhance the reputation of the Institute;
- To establish/enhance relationships with industry and the community.

General Guidelines for External Work

- Written permission to engage in such work must be sought in advance;
- It should not render the employee and his/her employers in breach of any legislation, including the Organisation of Working Time Act (i.e. will the external work mean the person works in excess of an average of a 48 hour week?);
- It should not interfere with the person's CIT work duties or the interests of the Institute;
- It should not give rise to a conflict of interest for the individual or the Institute;
- It should not be in competition with the Institute's own activities;
- It should give rise to no potential vicarious liability for the Institute (i.e. the external work should not be capable of being deemed to be carried out in the course of the person's employment with the Institute);
- It should not involve availing of any privileged or confidential information acquired in connection with employment by the Institute;
- The individual should maintain his/her own insurance/professional indemnity as necessary;
- The individual should not hold themselves out to be an agent of the Institute or to be otherwise working on its behalf;
- The individual should use his/her own address, contact details, premises and equipment. CIT resources, facilities or equipment must not be used unless specifically agreed in writing with the Institute;
- The individual should not use their Institute title unless specifically agreed in writing with the Institute.

Examples of External Work Requiring Approval

- Activities undertaken with or for a party other than the Institute that is remunerated by a source other than the Institute;
- Paid external consultancy work;
- Professional private practice;
- Sponsored research;
- Sole or part ownership or control of a company;
- Directorship of a company, irrespective of whether remuneration is received (this is a matter of public record and employees are not being asked to disclose information that the Institute could not otherwise access independently).

Examples of External Work that Do Not Generally Require Approval

The following may not require approval provided they do not conflict with the interests of the Institute and are not a source of remuneration:

- Refereeing of journal articles, papers and books;
- Occasional lectures, performances, exhibitions, conference participation, media appearances (while such activities may not require approval, CIT should be informed);
- Undertaking reviews related to academic programs and quality assessments;
- Examining for educational and professional bodies;
- Writing, editing or publishing scholarly or literary works;
- Artistic or musical works;
- Conducting religious services;
- Membership of religious, political, sporting, cultural or social organisations;
- Membership of editorial boards;
- Service on educational, professional and community committees and groups.

May 2010

1. Document Details

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Important Note: If the 'Status' of this document reads 'Draft', it has not been finalised and should not be relied upon.

2. Revision History

Version Number	Revision Date	Summary of Changes	Changes tracked?
1.0		Initial version	
2.0		To increase the scope of the policy to all staff and external parties/interests	Yes

3. Relevant/Related Existing Internal Documents

CIT	2001	<i>External Examiners – Policy and Procedures</i>
CIT	2003	<i>Campus Company Policy</i>
CIT HR Office	2010	<i>External Work Guidance Notes (and related documents)</i>
CIT	2011	<i>Intellectual Property Policy</i>
CIT Governing Body / IoTI	Jan. 2012	<i>Code of Governance of Irish Institutes of Technology – as amended to reflect the 2009 Code of Governance for State Bodies (adopted by Governing Body Feb. 2012)</i>
CIT	2013	<i>CIT Research Ethics Checklist and Policy</i>
CIT	Jan. 2013	<i>AC Procedure – Validation of Special Purpose, Minor and Supplemental Awards (Appendix 2)</i>
CIT	June 2013	<i>Regulations for Modules and Programmes (Marks and Standards) Version 4.0</i>
CIT	Sept. 2013	<i>Regulations for Postgraduate Research Study</i>
CIT Governing Body / IoTI	June 2014	<i>CIT Code of Conduct for Employees (adopted by Governing Body Dec. 2014)</i>
CIT Governing Body / IoTI		<i>CIT Code of Conduct for Members of Governing Body</i>

CIT Governing Body / IoTI	2018	<i>Code of Governance of Irish Institutes of Technology</i>
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4. Relevant/Related Existing External Documents

Oireachtas	1995 and 2001	<i>Ethics in Public Office Act, 1995 and Standards in Public Office Act, 2001</i>
Standards in Public Office Commission	Oct. 2008	<i>Guidelines on Compliance with the Provisions of the Ethics in Public Office Acts 1995 and 2001, Public Servants (Sixth Ed.)</i>

5. Consultation History

This document has been prepared in consultation with the following bodies/functions:

Council of Unions 06 September 2018

6. Approvals

This document requires following approvals (in order where applicable):

Name	Date	Details of Approval Required
Academic Council		
AC Executive Comm.		
Governing Body	02/05/2019	