



Athlone Institute of Technology
Conflict of Interest Policy





ATHLONE INSTITUTE OF TECHNOLOGY

CONFLICT OF INTEREST POLICY

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Questions relating to the content of this Policy should be addressed to:	conflicts@ait.ie		

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1. INTRODUCTION

1.1 General

Athlone Institute of Technology (the “**Institute**”) is a higher education institute and public research organisation located in Athlone, Co. Westmeath, Ireland. The Institute prides itself in the integrity of its teaching, research and all other activities. It is concerned to avoid any actual, perceived or potential Conflicts between the interests of the Institute and any personal interests of Institute Personnel.

This Policy sets out the procedures to be followed by the Institute in respect to **actual, perceived or potential Conflicts of Interest**. The Institute encourages Institute Personnel to engage in external activities, many of which are also of benefit to the Institute. On occasion activities may give rise to Conflicts of Interest. This Policy seeks to manage Conflicts of Interest in a manner that is fair to all.

Institute Personnel must disclose to the Institute activities, interests or commitments that may give rise to Conflicts. In most cases the notification of Conflict of Interest may be all that is necessary to fulfil the obligation required under this Policy, depending on the circumstances. However, there may be occasions where intervention by the Institute will be required to manage the Conflict of Interest.

The purpose of this Policy is to set out examples which may give rise to Conflicts of Interest and establish the Policy for the notification and management of Conflicts. The overarching message is that where there is any uncertainty on the matter the Conflict of Interest should be notified to the Institute. The notifications made under this Policy do not replace or substitute any additional declarations of Conflicts that an individual may need to make to third parties or where relevant to the Standards in Public Office Commission.

Institute Personnel are also referred to the Institute’s IP Policy, and staff are referred to the Grievance Policy, the Disciplinary Procedure and the Code of Conduct for Employees.

This Conflict of Interest Policy is not intended to undermine academic freedom. This Policy is effected without prejudice toward academic freedom.

1.2 Managing Conflicts

To ensure the highest standards of practice and to maintain the highest integrity of the Institute, the Institute is required to have policies and procedures in place for managing potential or actual Conflicts of Interest and to ensure that all Institute Personnel are aware of and follow these policies and procedures.

Any external activity engaged in by a Personnel Member must not be such as to interfere with the fulfilling of his or her duties and responsibility to the Institute. Any external employment, self-employment, working partnerships or consultancy work entered into by staff must have the prior written approval of the Institute.

Not every outside activity, interest or commitment will represent a Conflict of Interest but in case of any doubt, the activity, interest or commitment should always be reported to the Institute.

2. THIS POLICY

2.1 Purpose

This Policy sets out the Institute's policies and procedures, agreed by its Governing Body, to minimise and manage Conflicts of Interest. It is intended to provide guidance on identifying and managing Conflicts.

All Institute Personnel are encouraged to use good judgment in protecting themselves and the Institute from Conflicts of Interest and are required to report all potential Conflicts of Interest that may arise to the Institute.

2.2 Application and Scope

This Policy forms part of the regulations of the Institute which govern the conduct of Institute Personnel. This Policy applies to all Institute Personnel.

The Policy requires that all individuals must recognise situations in which that person may have a Conflict of Interest. The Conflict of Interest must be disclosed as provided for below.

If an individual is unsure if this Policy may apply to him/her, the matter should be raised to the appropriate Dean of Faculty / Head of Function.

From an ethical, integrity and reputation perspective, it is very important to the Institute to manage Conflicts of Interest in the context of research and Commercialisation. The Institute's IP Policy sets out examples of actual and potential Conflicts of Interest which may arise in research and/or Commercialisation activities. Conflicts of Interest arise in many circumstances and are not only linked to Conflicts in research and Commercialisation.

2.3 Related Documents

This Policy is intended to complement the existing policies and procedures of the Institute including, in particular, the Code of Governance for Institutes of Technology, the Code of Conduct for Employees, the Code of Conduct for Members of Governing Body, the Institute's IP Policy, and the Institute's guidelines and procedures regarding 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 Institute Personnel from any obligations they may have under the Acts or any other pertinent legislation.

2.4 Definitions

Unless the context otherwise requires, all capitalised terms used in this Policy have the meaning given to them in Annex I.

2.5 Review of and Changes to this Policy

This Policy shall be reviewed by the Institute at least every four years and also within six months of the introduction of updates to the Code of Governance or National IP Protocol or any other significant change in national policy or guidance and may be amended at any time by the Institute in accordance with its normal procedures.

3. CONFLICTS OF INTEREST

3.1 Conflicts of Interest

As set out above a Conflict of Interest is an actual, a potential or a perceived Conflict of Interest.

A Conflict of Interest arises:

- a) 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; and/or
- b) when the commitments, duties, independence and objectivity owed by an individual to the Institute are likely to be or may appear to be compromised by a commitment to another body or person (private company; funding body; family member; or a close friend). This includes where the individual may have resulting personal gain or benefit (financial or otherwise) or there may be gain or benefit to a family member or a close friend. A Conflict of Interest may be financial or non-financial.

A Conflict of Interest may arise:

- a) where an individual's judgement with respect to work being carried out for the Institute is unduly influenced by a secondary interest or there is seen to be an incentive to take certain actions by the individual; and/or
- b) an external activity or commitment compromises an individual's ability to perform all of the activities reasonably expected of him or her by the Institute and/or prevents an individual from devoting the time and energy required to meet his or her responsibilities at or for the Institute.

Where there is an appearance of or potential for a Conflict of Interest, even where none arises, the matter should be disclosed. Individuals must consider how a situation may be perceived.

Financial Conflicts

A financial Conflict of Interest is one, as outlined above, where there is or appears to be an opportunity for personal financial gain or financial gain to a family member or close friend. The financial value is immaterial and financial interest would include anything of monetary value. Any financial interest should be disclosed in accordance with this Policy.

Non-Financial Conflicts

A non-financial Conflict of Interest may include any kind of benefit or advantage, including any form of career enhancement (direct or otherwise), enhancement of education or similar gain for the individual or to a family member or close friend.

In the context of research, activities being undertaken by a Personnel Member under one or more grant-funded programmes of research or other collaborations or as part of his or her permitted external activities from time to time, might present an actual or potential Conflict of Interest.

Recognising that it is difficult to anticipate all Conflicts in advance, Institute Personnel are reminded that questions regarding this Conflict of Interest Policy may be made informally and confidentially at any time to the Office of the Vice President of Finance and Corporate Affairs.

4. IDENTIFYING CONFLICTS

4.1 Responsibility

The responsibility for avoiding Conflicts of Interest rests, in the first instance, with each Personnel Member. It is the duty of all persons to whom this Policy applies to disclose any potential or perceived Conflict of Interest.

As a condition of employment, engagement or admission by the Institute, each Personnel Member shall comply with this Policy and shall cooperate with the Institute, and the Conflicts Committee, and furnish all such information, documents and reasonable assistance as may be required to review, determine and/or manage any potential Conflict and to otherwise enable the Institute to fulfil its obligations under this Policy and the National IP Protocol to minimise and manage Conflicts of Interest.

With respect to any actual, perceived or potential Conflicts of Interest relating to research activities and/or the Commercialisation of Intellectual Property (including through a Spin-Out Company), Institute Personnel are also referred to the Institute's IP Policy.

4.2 Examples of Possible Conflicts

A potential Conflict of Interest occurs when a Personnel Member's personal or private activities, interests or commitments might lead an independent observer to reasonably question whether his or her professional actions or decisions are influenced by

considerations of personal interest, financial or otherwise. Listed below are examples of situations that **may** give rise to a perception of potential or actual Conflict of Interest. This list is provided by means of example only and is non-exhaustive.

- Use of public grant funds or other resources to realise inappropriate personal gain;
- Private business related to a research programme or activities;
- Employment in addition to Institute employment;
- Outside professional activities and consultancy;
- Holding executive or non-executive directorships;
- Holding an interest in an external body which is involved in the negotiation of any research or licence agreement or other arrangements with the Institute;
- Receipt of gifts or direct benefits, such as sponsorship, provision of materials, facilities or personal support, travel, accommodation, conference fees or expenses from external organisations or individuals with a direct interest in the subject matter or materials of a Personnel Member; and/or
- Any other activity or interest which would be deemed under the Institute's IP Policy and/or the National IP Protocol to constitute a Conflict of Interest.

4.3 In Case of Doubt

Where there is doubt as to whether a potential or actual Conflict of Interest exists, the activity, interest or commitment must be reported as set out below.

5. REPORTING PROCEDURES

5.1 When to Disclose

A Conflict of Interest should be reported at the time the Conflict of Interest first arises or the first indication that there may be a perception of a potential for a Conflict.

Disclosure of potential Conflicts of Interest should be made:

- (a) prior to the commencement of such a Conflict;
- (b) when circumstances change in such a way that may give rise to a potential Conflict; and/or
- (c) in response to such information requests or updates as may be required by the Institute from time to time in accordance with its relevant procedures.

In the context of research activities undertaken (or intended to be undertaken) by a Personnel Member and/or the Commercialisation of any resulting, or other, Intellectual Property, the Personnel Member must make a Notification if they have any personal interest in relation to a proposed sponsor / collaborator or investor or any joint venture,

company or party who may be granted certain rights or licences by the Institute to commercialise Institute IP.

5.2 Forms and Supporting Documents

All disclosures must be made by completing the Notification of Potential Conflict of Interest Form, a copy of which is attached hereto at Annex II, and by providing such additional information and documents as may be reasonably required.

5.3 Reporting

The Conflict of Interest should be reported as follows:

- To the Dean of Faculty / Head of Function.
- If the Dean of Faculty / Head of Function has an interest in the matter, the Conflict of Interest shall be reported to the Vice President of Finance and Corporate Affairs.
- In the case of a student, he/she should discuss the potential Conflict of Interest with his or her Supervisor or Principal Investigator. The student following discussion with their Supervisor or PI should complete the Notification of Potential Conflict of Interest Form and submit it to their Dean of Faculty.

6. MANAGING A CONFLICT

6.1 Managing a Conflict

In many cases, a Notification of the potential Conflict of Interest will be sufficient and no further action will be required.

In some cases there may be a need for The Institute to manage the Conflict. The following may be appropriate ways in which to manage the Conflict of Interest but this is not an exhaustive list:

- Abstention from meetings, decisions, or discussions on certain matters;
- Agreeing not to act as a particular student's supervisor or the appointment of a second supervisor;
- Not sitting on an interview panel or disclosure in the Confidentiality and Declaration of Interest Form prior to the interview;
- Referring to others certain matters for decision;
- Standing aside from any project that creates the Conflict of Interest;
- Declaring the Conflict of Interest to a relevant third party (for example a funding body).

Where a Conflict of Interest is deemed to be serious, it may be necessary for the Personnel Member concerned to discontinue a conflicting activity or commitment.

Where advice or recommendations received in relation to a given Conflict (from the Dean of Faculty / Head of Function) are adhered to then there will be no further Institute accountability to that person; this is subject to full disclosure of the Conflict. It should be noted that this does not remove any external obligations such as legal actions outside of the Institute.

The Institute has in place a Conflicts Committee. In the event that a Conflict cannot be adequately resolved at Faculty/Function level it should be referred to the Conflicts Committee by the Dean of Faculty / Head of Function. The Conflicts Committee will make a recommendation to the President, who has the authority to issue binding instructions with regard to the management of the Conflict. The decision of the President shall be final notwithstanding the option of staff to avail of the Institute's grievance procedures.

6.2 Conflicts Register

Conflict of Interest Notifications, with details as to how the Conflict was dealt with and resolved, will be recorded in the Institute's Conflicts Register as set out in Annex III.

The Conflicts Register will be held confidentially by the Office of the Vice President of Finance and Corporate Affairs.

Any Conflict of Interest disclosed must be updated as new information becomes available which could affect the previously notified Conflict.

Where a Conflict of Interest concerns Intellectual Property or externally funded projects, the Office of the Vice President of Finance and Corporate Affairs will inform the IP Committee of the Notification and the actions agreed.

The Conflicts Register will be reviewed at regular intervals by the Vice President of Finance and Corporate Affairs and an annual report including a summary of all potential Conflicts will be provided to the Governing Body. This report will have due regard to the Institute's obligations under Data Protection legislation and the Institute's Data Protection policies.

7. THE CONFLICTS COMMITTEE

7.1 Composition

Unless otherwise constituted by the Institute at its discretion, the Conflicts Committee will comprise of the Vice President of Finance and Corporate Affairs, the Vice President for Academic Affairs and Registrar, the Vice President for Research, the Human Resources Manager (and/or their respective nominees, equivalents or successors) and such other Institute representatives or other technical or legal advisors or experts as the Institute may nominate from time to time.

7.2 Role and Responsibilities

The Conflicts Committee will:

- Provide information, advice and assistance to Institute Personnel on Conflicts and the Conflict of Interest Policy;
- Revise the Conflict of Interest Policy where necessary;
- Ensure there are systems in place to promote and monitor compliance with the Conflict of Interest Policy;
- Promptly review and determine the status of all reported activities and interests;
- Handle and maintain all reported activities and interests in confidence;
- Determine the actions necessary to resolve or manage a potential or apparent Conflict referred to the Conflicts Committee;
- Ensure actions are implemented;
- Update the Conflicts Register on reported activities and interests and record responses;
- Provide such certifications as may be required from time to time to meet funding agency conditions or other similar requirements; and
- Regular audit of the Conflicts Register.

The mechanisms for managing Conflicts of Interest shall be reviewed on a regular basis but at least annually by the Conflicts Committee.

7.3 Determination by Conflicts Committee

The Conflicts Committee's determination on Conflicts referred to it will be based on the information disclosed in the Notification of Potential Conflict of Interest Form and such other information, documentation and materials as may be reasonably requested and/or provided from time to time, having due regard to all relevant circumstances.

The Personnel Member shall be entitled to meet with the Conflicts Committee and/or to present to it such additional information as he or she deems relevant to enable the Conflicts Committee review and determine the matter.

7.4 Where a Conflict Exists

If the Conflicts Committee determines that a Conflict of Interest exists, the Conflicts Committee will make a recommendation to the President, who has the authority to issue binding instructions with regard to the management of the conflict. The decision of the President shall be final notwithstanding the option of staff to avail of the Institute's grievance procedures.

8. EXTERNAL WORK

8.1 External Work

External work does not create a conflict in of itself, but has the potential to. All staff of the Institute are obliged to apply annually for authorisation to engage in external work through the President's Office. This is in addition to the obligations to declare Conflicts as set out above.

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 AIT, 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 the President's Office.

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.

9. OBLIGATIONS

9.1 Non-Disclosure of Conflict

In the event that there is a non or partial disclosure of a Conflict of Interest by staff, the Institute reserves the right to invoke its Disciplinary Procedure in relation to the matter.

9.2 Confidentiality and Freedom of Information

Conflict of Interest Notifications may be subject to disclosure under Freedom of Information.

All Conflict of Interest Notifications including related actions will be held in confidence to the maximum extent permissible but shall be saved into the Conflicts Register.

Any personal data shall be held and maintained in accordance with data protection requirements, including applicable data protection laws, and the Institute's Data Protection policies.

9.3 Publicly Funded Research and Reporting Obligations

In any case affecting a partially or wholly State funded research programme, the Institute (and/or the Conflicts Committee) is required to report to the State research funding organisation concerned any unresolved Conflict of Interest and must agree with that funding organisation appropriate steps to deal with the Conflict.

9.4 Written Records; Retention and Audit Rights

All notified Conflicts, including written records of how the Conflicts were dealt with and resolved, will be entered to the Conflicts Register maintained by the Office of the Vice President of Finance and Corporate Affairs.

All records will be retained for a period of at least seven (7) years from the date of Notification. Without limiting the Institute's obligation to treat and maintain confidentially all disclosures made pursuant to this Policy, the Conflicts Register and the records of the Conflicts Committee (including any and all disclosures) may be subject to internal audit from time to time in accordance with the Institute's relevant procedures and Data Protection Policies.

9.5 Governing Body

A summary of all potential Conflicts of Interest will be reported to the Institute's Governing Body annually by the Vice President of Finance and Corporate Affairs, along with the annual review by the Conflicts Committee of existing management mechanisms for Conflicts of Interest. Evidence of this annual reporting and review will be made available to the Higher Education Authority, on request.

10. ADMINISTRATION OF THIS POLICY

10.1 Responsibility

In the Institute, the responsibility for the implementation and administration of this Policy rests with the Vice President of Finance and Corporate Affairs.

10.2 Contact Information

Any queries regarding this Policy should be directed to the Office of the Vice President of Finance and Corporate Affairs.

ANNEX I

DEFINITIONS

In this Policy, the following expressions will have the following meanings, unless the context otherwise requires or otherwise defined therein.

“Commercialisation” means using Intellectual Property to create or develop a commercial activity.

“Conflict(s) of Interest”/“Conflict(s)” means an actual, perceived or potential Conflict where the personal interests of a person may be in Conflict (or perceived to be in Conflict) with the interests of Athlone Institute of Technology (the **Institute**).

In the context of research and/or Commercialisation activities, the circumstances in which a Conflict of Interest occurs include when financial or personal considerations, including Reportable Financial or Personal Interests, influence the professional judgment of a Personnel Member who is in a position to:

- (i) influence the design or conduct of research or the publication or use of research results; or
- (ii) realise inappropriate personal gain, directly or indirectly, from the use of public grant funds or other resources.

“Conflicts Committee” means the committee established from time to time by the Institute to receive, review, assess and manage reports of potential or actual Conflicts of Interest.

“Connected Person(s)” means spouse or current partner, child under the age of 18 years, brother, sister, father, mother or any other direct blood relative (no more than once removed), or any company or corporate entity in which the Personnel Member is interested by virtue of a shareholding (other than a shareholding of less than 5 per cent in respect of any company listed and/or traded on any recognised investment exchange) or a directorship.

“Institute” means Athlone Institute of Technology having its headquarters located at Dublin Road, Athlone, Co. Westmeath, Ireland.

“Institute Personnel” means any and all persons who:

- (a) are employed or engaged as a member of staff of the Institute;
- (b) are engaged by the Institute as a non-employee, including but not limited to visiting academics, consultants and contractors; and/or
- (c) otherwise fall within the scope of and are subject to the Institute’s IP Policy.

“Intellectual Property” or **“IP”** means patents, trade marks, service marks, registered designs, drawings, utility models, design rights, business ideas, concepts, inventions, discoveries, breeders’ rights, materials, copyright (including the copyright in software in any code), database rights, know-how, trade secrets and other confidential information, technology, business or trade names, goodwill and all other rights of a similar or corresponding nature in

any part of the world, whether registered or not or capable of registration or not, and including all applications and the right to apply for any of the foregoing rights.

“IP Committee” shall mean the IP Committee of the Institute as from time to time constituted pursuant to and in accordance with the IP Policy.

“IP Policy” means the Intellectual Property Policy of the Institute in force from time to time (and any subsequent amendments made to it).

“National IP Protocol” means the set of objectives, agreed by the Irish Government, governing the management of and access to Intellectual Property undertaken in the Irish public research system as set out from time to time in the policy document entitled *“A Framework for Successful Research Commercialisation”* (March 2019) and any valid amendments or supplements thereto.

“Personnel Member” means a member of Institute Personnel.

“Policy” means this Conflict of Interest Policy (and any subsequent amendments made to it).

“Reportable Financial or Personal Interests” means where a Personnel Member and/or his or her Connected Persons has or have a financial, personal or other beneficial interest in or to, or material to:

- (a) the design, conduct or reporting any research activities undertaken, or intended to be undertaken by the Institute;
- (b) the Commercialisation of any Intellectual Property in relation to or resulting from such research activities; and/or
- (c) any matter that falls to be considered under this Policy and/or the National IP Protocol by the Conflicts Committee.

For the avoidance of doubt, Reportable Financial or Personal Interests shall **not** include salary, royalties or other remuneration paid by the Institute to the Personnel Member while employed or engaged by the Institute.

ANNEX II

**ATHLONE INSTITUTE OF TECHNOLOGY
NOTIFICATION OF POTENTIAL CONFLICT OF INTEREST**

The purpose of this form is to notify and record any Conflict of Interest.

Completing the Form

- Please read the Institute’s Conflict of Interest Policy before completing this form (available on the Intranet or from the Office of the Vice President of Finance and Corporate Affairs).
- The form should be completed by the individual making the Notification related to a perceived or actual Conflict of Interest, to include the individual’s proposals to manage any Conflict.
- The individual should sign and send the form to their Dean of Faculty / Head of Function.
- The Dean of Faculty / Head of Function will review the form and may decide that no Conflict (actual, perceived or potential) arises, or if such a Conflict does arise, the steps that will be taken to manage it.
- The Dean of Faculty / Head of Function will then send a copy of the form to the Office of the Vice President of Finance and Corporate Affairs for recording on the Conflicts Register.
- Any approvals given in relation to a particular Conflict remain valid for 3 years, at which point it should be renewed. The individual with the Conflict is responsible for initiating the renewal process.
- If the approval has not been secured prior to the renewal date, approval will be deemed to have lapsed.
- If there is a material change in circumstances related to a notified Conflict during the 3 year approval period, the individual should submit a further version of this form to obtain approval for the revised circumstances.

Individual Details

Name	
Staff Number	
Job Title	
Faculty / Function	
Dean of Faculty / Head of Function	

General Details

Is this a new request or a request to renew/update a previous approval granted in accordance with the Institute’s Conflict of Interest Policy? Please mark X as applicable.

New Notification	
Revised/Renewed Decl.	

If this is a revised/renewal declaration, complete the following table.

Date of First Notification	
Date of Last Approval	

Details of Conflict

Describe in full Conflict (actual, perceived or potential), including the possible risks to both you and AIT as you see them. Should you have questions related to the Conflict of Interest, please seek guidance from your Dean of Faculty / Head of Function.

How do you propose to manage the Conflict?

Individual Declaration

In forwarding this completed form to my Dean of Faculty / Head of Function for approval, I confirm that:

- The information above is correct;
- I have read the Conflict of Interest Policy; I understand it; I comply with it and I will continue to comply with it;
- I will provide an updated request form if the situation changes materially regarding either my role or the Conflict.

Signed: _____ Date: _____
(Individual Declarant)

ANNEX III

ATHLONE INSTITUTE OF TECHNOLOGY
CONFLICTS REGISTER

Conflict Number (Year/No)	Individual Declarant	Recipient of Notification / Approver	Details of Conflict	Steps Taken to Manage	Dates Covered / Approval Period	Further Comments	Refer to IP Committee Y/N