



Conflicts of Interest in Research and Innovation Policy

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Purpose

Cranfield University is a research-intensive institution with world-class expertise, facilities and partnerships. To retain our reputation for research excellence, it is essential that the management of research and innovation activity upholds our [Institutional Values](#) and our [Ethics Code](#). This includes an expectation that we manage actual or perceived conflicts of interest (COI) in research and innovation, as we do separately through the disclosure and institutional reporting of **Directorships, Consultancies, Outside Work and External Visiting Appointments Policy** (see [related documents](#)).

COIs, if left unmanaged, could compromise the quality and integrity of our research, and/or have ethical and legal implications or raise liabilities for the University and individuals. COIs therefore require disclosure and proportionate management.

Scope

This policy applies to all staff and students of Cranfield University who are engaged in research, including the delivery of research and knowledge exchange projects, the professional support of research, knowledge exchange and commercialisation, the management of research facilities and the oversight of resources that support research and innovation at Cranfield University.

The University relies on its staff to act professionally in line with the **Staff Handbook** (see [related documents](#)).

This COI policy also supports our **Research Ethics Policy** (see [related documents](#)) by maintaining professional standards that comply with ethical, legal and professional frameworks, and Cranfield's adoption of **UUKs Concordat to Support Research Integrity** (see [related documents](#)) and its principles.

For the purposes of this policy, a conflict of interest (COI) may arise when a Cranfield staff member or student, engaged in research and/or innovation, has **an additional interest that may compromise their obligations to the University**, or any other organisation with which the University has an institutional relationship. This includes the perception, by others, that such obligations could be compromised. Conflicts can occur when, due to other interests, staff

members could be incentivised, actually or inadvertently, to influence a decision that affects the University. This includes the design and execution of research, knowledge exchange and commercial activities flowing from research activity. COIs can be financial (e.g. direct monetary gain) or non-financial (e.g. perceived career gain; PhD student recruitment) and they should be managed so to protect the integrity of the University and uphold its public standing.

The University benefits from a series of productive partnerships with external bodies, consultancies, Government Departments and their agencies, among others, so it is to be expected that Cranfield staff may have professional and/or private relationships with people in these external organisations that, on occasion, interface with the work of Cranfield University. Examples of COIs include, but are not restricted to:

- in deciding whether, or not, to award a contract, or collaborate on favourable terms with an organisation in which a friend or relative has a financial interest;
- by obtaining, or being perceived to obtain, financial benefit for themselves in return for providing financial advantage to known others with whom the Cranfield staff member has a relationship;
- by disclosing confidential information to others for actual or perceived financial or non-financial benefit;
- by using institutional resources for a friend or relative in return for financial, or non-financial resources;
- when compromising research integrity for financial or non-financial return;
- by engaging in external activity that might infringe the rights of a student to complete her/his studies, publish freely or communicate their findings, including through Directorships held by the staff member or a relative/friend that could influence the student's rights;
- through the involvement of a Cranfield staff member with an external organisation, whereby their involvement could influence, or appear to influence, the award of a contract to Cranfield University, such as through paid consultancies, paid memberships on a Board of Directors or Advisory Board, through equity holdings in, or royalty income from the external enterprise;
- personal involvement in any company or commercial enterprise which is in a contractual relationship with Cranfield University, or which is in the process of negotiating a contract, where the staff member has been concerned or connected with placing or negotiating the contract, or with the research, or other activity the contract might cover.

Policy Statement

It is useful to recognise that the suspicions of others may be raised even where the Cranfield member of staff, or student behaves with professional integrity. This policy is therefore designed to protect staff, students and the University from potential reputational damage and other liabilities that are associated with actual or perceived COI in research and innovation.

1. Cranfield staff and students are expected to disclose and resolve conflicts of interest promptly.

2. If a staff member or student believes they have or may have a COI, whether actual or perceived, they have **a duty to disclose it and take advice on the actions required to manage the conflict**.
3. Staff must have respect for the University's interests and public standing, consider whether they have a COI and **report any conflict to the person(s) responsible for overseeing the activity in which the conflict has arisen** (e.g. the principal investigator of a proposal or research award, the chair of a decision-making panel) and to their line manager.
4. Students should discuss any COI with their Course Director or Research Supervisor in the first instance.
5. For senior officers of the university, the notification route is through the Vice-Chancellor and Chief Executive.
6. There is no minimum financial or non-financial level at which staff or students should consider the importance of a COI and, if in doubt, disclosure should be made for consideration by others.

It is always best to err on the side of caution and disclose a potential COI if there is uncertainty about how it may be perceived by others. Senior staff can then take an objective view of the issue and advise on a suitable outcome that protects the interests of the University as a priority. This might include wider disclosure or discussions with third parties, the staff member becoming disassociated with aspects of the research in question, or a modification of their involvement, or the imposition of checks and balances to manage the COI, or perceived COI.

- A record of the COI declaration and any mitigations applied should be kept by both the person receiving the disclosure and the person making the disclosure. COI declarations should ideally be kept with other documentation relating to the activity (e.g. recorded in minutes for panel meetings, in Worktribe for research funding applications).

Researchers and those engaged in University research and commercialisation must be especially mindful of the obligations upon them by virtue of research contracts and the terms and conditions placed on Cranfield University by funders and partners. **Principal investigators usually hold primary accountabilities for research integrity**. Opportunities for the disclosure of COIs include, for example (but are not limited to):

- in making grant applications where there might exist personal interests in relation to the funder;
- in reviewing research proposals, papers, and participating in funding panels where relationships might influence a decision on funding or acceptance of a research output;
- in accepting contracts or sub-contracts whereby the notification of disclosures is required, and where written plans for managing COIs may be requested, before contract signature;
- where staff or students have a financial or non-financial interest in a company that seeks to benefit financially from the award of a research contract or grant;
- in submitting research papers for publication, whereby editorial guidelines usually require COIs to be declared by authors;
- where a student's supervisor has a financial or non-financial interest in a company that supports the student's research;
- during management decisions where senior managers may be making decisions regarding proposals that receive internal funding, or are selected for external application slots (such

as via demand management), especially where these decisions may overlap with the senior manager's own research interests or research group.

Key Roles and Responsibilities

Cranfield University is responsible for:

- Establishing appropriate policies and procedures to manage conflicts of interest in order to protect the institution and its staff and students.

Staff and students are responsible for:

- Declaring any conflicts of interest, to follow advice on mitigating actions and to keep a record of declarations and actions taken.

Line managers and supervisors are responsible for:

- Recording any declared conflicts of interest and; advising on appropriate mitigating actions or seeking advice from others with relevant expertise.

Monitoring Compliance

Failure to declare a COI could result in disciplinary action.

Records of declarations and any mitigating actions should be stored and made available upon request, if required for audit purposes.

Related documents

[Directorships, consultancies, outside work and external visiting appointments Policy](#)

[Staff Handbook](#)

[Research Ethics Policy](#)

[Concordat to Support Research Integrity](#)

[Research Integrity Policy](#)

Further guidance

Questions related to this policy should be directed to Research-Integrity@cranfield.ac.uk

Document control

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