



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 1 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title : Conflict of Interest Policies for All Academic Staff

Approved by : SMU Board of Trustees

CONTENTS

- I. Introduction
- II. General Obligations
- III. Definitions
- IV. Academic Staff's Responsibility
- V. Management's Responsibility
- VI. Conflict of Commitment
- VII. Conflict of Interest
- VIII. Types of Conflict of Interest
 - Interest in extramural organisations
 - Acceptance of engagements through Extramural Organisations
 - Specific policies relating to Private Education Institutions
 - Disclosure of University affiliation in publications of Extramural Organisations
 - Disclaiming University relationships
 - Conflict of interest in externally sponsored research
 - Disclosure to responsible University officials
 - Distribution of effort
 - Use of University resources
 - Procurement of goods and services
 - Individual gifts
 - Teaching of family and other close relations
 - Employment of more than one family member
- IX. General Disclosure Obligations
 - Annual declaration of interests
 - Ad hoc disclosures



Issue Date : 1 Jan 2011
PART : II
SECTION : 2.7
Revision No. : 3
Revision Date : 1 Jul 2021
Page : 2 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

X. Advice and Guidance



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 3 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

Introduction

1. This policy applies in full to all SMU Faculty and Academic Support Staff. Parts of the policies also apply to Associated Faculty who are not on full-time appointments at the University.
2. In this policy, "Academic Staff" refers to all SMU Faculty, Academic Support Staff and (where applicable) Associated Faculty.
3. The purpose of this policy is to establish a framework for mitigating, managing, and resolving Conflict of Commitment (defined in paragraph 12) and Conflict of Interest (defined in paragraph 25) that Academic Staff may encounter in the course of their work at SMU.
4. This policy cites specific types of activity that have commonly been found to conflict with the obligations of Academic Staff, and the procedures and regulations that have been devised to identify and resolve such conflicts. These are intended to serve as examples and not as a comprehensive compilation. Situations not covered by them will be guided in the light of the general obligations set out below.

General Obligations

5. All Academic Staff have a duty to act with honesty, integrity, and in the best interests of the University when performing their duties, and to abide by the highest standards of research, educational, professional, and ethical conduct. Examples of actions that run counter to this general obligation include nepotism, discrimination on the basis of irrelevant characteristics, inappropriate use of the University's name, exploitation of any aspect of association with the University for unacceptable purposes or private gain and conflict of commitment. They are proscribed at all times for all Academic Staff, including those who are not on full time employment as noted in the relevant sections of this document.
6. Employment on a full-time basis presumes a primary commitment of time and intellectual resources to the academic mission of the University and its functioning as a community. This duty requires Academic Staff to avoid excessive commitment



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 4 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

of time or mental effort to extramural engagements or other non-University activities during the academic year.

7. The obligation to act in the best interests of the University also entails that Academic Staff must at all times be vigilant to avoid placing themselves in positions where their personal interests may conflict with those of the University. Where such conflict arises or is perceived to have arisen or may arise in the future, the Academic Staff must promptly take such step(s) as is (are) necessary to eliminate, mitigate or otherwise resolve the conflict in accordance with the principles and provisions of this policy.

Definitions

8. For the purposes of this policy document, the following definitions shall apply:
 - a) “Extramural Organisation” means any business entity (whether constituted as a company, partnership, or sole proprietorship), association, club, society, institution, trust, foundation, and government agency, that is external to SMU, regardless whether it is for profit or non-profit, and whatever its objects and purposes and for the avoidance of doubt, includes start-ups entity that are spun out of the University by Academic Staff.
 - b) “Family Member” generally includes spouse/partner, parent, step-parent, child, step-child, child by adoption, sibling, grandparent, grandchild, uncle, aunt, cousin, niece or nephew of the Academic Staff or of the Academic Staff’s spouse/partner and would include the fiancé/fiancée and boyfriend/girlfriend of the Academic Staff.
 - c) “Financial Interests” refers to anything of value (whether or not the value is readily ascertainable) including but not limited to pay, commission, profits, royalty, shares, (forgiveness of) debt, investments, property, licensing income, and honoraria.



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 5 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

Academic Staff's Responsibility

9. SMU Academic Staff should be sensitive to and avoid situations which could raise questions of actual, potential or perceived conflict of interest or commitment. Whenever a staff is in a situation where conflict of interest or commitment may be actual, potential or perceived or where the staff may in any way be in violation of this policy, the staff must promptly make full disclosure of the conflict and submit a declaration with details of the conflict to his/her Dean or Head of Department and must promptly declare their interests in the organisation (in accordance with paragraphs 58 to 62 and recuse himself/herself from any SMU matter(s) that the conflict pertains to. Academic Staff are strongly encouraged to always err on the side of caution and submit such disclosures whenever in doubt and/or to recuse himself/herself from any SMU matter(s) that the conflict pertains to, rather than risk being in violation of the policy.

Management's Responsibility

10. Deans and Heads of Department (HoDs) have the responsibility to understand and implement this policy, which includes ensuring that their Academic Staff are aware of their obligations under this policy and periodically reminding them to refresh their understanding of this policy.
11. Deans and HoDs are to review the declarations submitted by their Academic Staff in their School/unit and, in coordination with relevant University offices, put in place necessary arrangements to mitigate the risks arising out of the conflict of interest or commitment as necessary.

Conflict of Commitment

(a) Definition

12. A Conflict of Commitment may occur when a full-time Academic Staff engages in extramural activities. Extramural activities are activities carried out with and which serve the interests of Extramural Organisations. These activities may be



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 6 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

remunerated or non-remunerated, but typically require a commitment of time or effort that is more than negligible. Such activities may (either in actuality or in appearance) interfere or compete with SMU's educational, research missions, or with that individual's ability or willingness to perform the full range of responsibilities associated with his or her roles and position in the University.

13. Forms of extramural activities include (but are not limited to) part-time engagement which could be remunerated or non-remunerated as a technical or professional consultant or practitioner and the formation of, or association with, Extramural Organisations.

(b) Policy and Discussion

14. The University recognises that it is appropriate for SMU Faculty and Academic Support Staff to have necessary and proper associations with government, professional agencies, and public or private organisations, especially when it may enhance their competence and reputation as scholars. Such associations may also fulfill the University's public service responsibilities and bring credit to the University. Consequently, the University permits and encourages such associations, subject to the limits and constraints discussed in this policy to avoid conflict of commitment and interest.

15. It is crucial that participation in extramural activities and associations do not compromise the ability of SMU Faculty and Academic Support Staff to meet the specific responsibilities and professional activities that constitute their commitments to their respective schools, academic units/programmes, and other administrative departments. The responsibilities and activities that constitute an appropriate primary commitment to SMU will differ across Schools, departments and units, but they should be based on the Academic Staff's terms of employment supplemented by a general understanding between the Academic Staff and his or her HoD and/or Dean. However, even with such understanding in place, attempts of Academic Staff to balance SMU responsibilities with extramural engagement can result in conflicts regarding allocation of time and efforts.

16. Academic Staff employed on a full time basis are expected to accord primary commitment of their time, ability and attention to the mission of the University. As



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 7 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

such, they should not engage in extramural associations to such extent that detracts significantly from their availability for normal academic duties.

17. The total time involved in extramural and intramural activities must be limited to one day per week for the period covered by the base salary and (where applicable) salary ninths. For example, an Academic Staff on two ninths may have a maximum of 48 days over 11 months. Exceptions to this will be permitted only with the specific approval of the Dean in consultation with the Provost prior to the engagement. Subject to the Dean's approval, there is no restriction to the amount of time spent on intramural and extramural activities during the unfunded period (i.e. the 12th month).
 18. Part-time Academic Staff (such as Associated Faculty) would typically hold full or part-time employment elsewhere. Such employment would not, on its own, create a Conflict of Commitment or Interest vis-à-vis SMU.
- (c) Procedures to avoid or mitigate Conflict of Commitment
19. A full-time Academic Staff intending to engage in extramural activities must submit an [online](#) application to seek the prior approval of his or her Dean or HOD, giving details of the identity of the Extramural Organisation, the nature, duration, and time commitment of the engagement, the terms of the remuneration (if any) and any other information relevant for assessing the Academic Staff's ability to discharge his or her professional obligations to the University.
 20. A full-time Academic Staff should only accept an extramural engagement with the prior approval of the Dean, such approval to be granted only upon the Dean's satisfaction that the proposed engagement will not materially compromise the availability and ability of the full-time Academic Staff to discharge his or her professional obligations to the University.
 21. A full-time Academic Staff who holds a position of responsibility (continuing or temporary) with an Extramural Organisation shall make clear to the organisation that the obligations, in terms of both time and responsibility, of the staff to the Extramural Organisation are limited by and subject to the policies, procedures, rules and regulations of the University and the School. To the extent practicable and



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 8 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

relevant, these limits should also be disclosed in the organisation's publications, alerting both the public and the full-time Academic Staff's business associates that duties to the organisation are thus limited. The Provost will have the power to require such a disclosure in any instance where he or she considers it necessary. The suggested format for such a disclosure is:

"Ang B. C., a Vice-President of this corporation, is a member of the faculty of the Singapore Management University and as such is subject to limitations by the University on the time that may be devoted to the affairs of this corporation. In any instance where the interest of this corporation may conflict with the interest of the Singapore Management University, Ang B. C. will resolve such conflicts in favour of the Singapore Management University."

Conflict of Interest

22. Aside from Conflict of Commitment of time and effort, Academic Staff should also be sensitive to situations which could raise questions of actual, perceived or potential conflicts between their personal interests and SMU's interests. Such conflicts may be pecuniary or non-pecuniary in nature and may or may not involve personal benefit. Academic Staff should also be mindful that some situations may give rise to perceptions of conflicting interest notwithstanding that there exists no actual conflict.
23. SMU is committed to operating in a highly ethical manner and in compliance with legal and regulatory requirements. This is to provide all Academic Staff with an open, collaborative and conducive environment in which to produce world-class research and distinguished teaching. Undisclosed or inappropriate conflict of interest can compromise the integrity of SMU, reflect negatively on our faculty, result in financial and other sanctions on SMU, and harm public interests. Consequently, it is SMU's policy to require full and timely disclosure of all actual, potential and perceived conflict of interest and to mitigate such conflicts with proper management.
24. SMU has broad powers to require disclosures of conflict of interest, investigate, manage, eliminate and release information of such conflicts, and impose appropriate sanctions for violation of this policy. By way of example, the types of management



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 9 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

actions that may be taken in response to a conflict of interest include: reviewing and, where appropriate, monitoring the conflict; imposing conditions or restrictions intended to manage, mitigate or eliminate such conflict; obtaining more background information and documents; prohibiting a conflicted person from involvement, including exercising personal influence, in connection with a matter; obtaining waivers, consents and/or authorisations; appointing an oversight body to monitor the conflict or other activities; requiring relinquishment of interests and/or restructuring or severance of relationships that contribute to the conflict.

Definition

25. A Conflict of Interest arises whenever the personal, professional, commercial, or Financial interests or activities of the Academic Staff may either potentially or actually:
- a) compromise the Academic Staff's objective judgment;
 - b) cause bias in the nature or direction of scholarly research;
 - c) damage the University's reputation;
 - d) influence an Academic Staff's decision or behaviour with respect to teaching and student affairs, appointments and promotions, uses of University resources, interactions with human subjects, or other matters of interest to the University;
 - e) compromise the independence of the University's business activities; or
 - f) result in personal, family member, or third party's gain or advancement at the expense of the University.

Types of Conflict of Interest

26. Conflict of interest may take different forms and arise in a wide variety of contexts. The following discussion considers various types of conflicting interest that may arise in the context of an educational institution and provides additional guidelines on how they are to be managed. For the avoidance of doubt, situations of actual or potential conflicts not falling within these specific categories must nevertheless be



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 10 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

disclosed and managed in accordance with the general principles stated in this policy.

Interest in Extramural Organisations

27. Full-time Academic Staff and/or their Family Members (defined in paragraph 8.b) may have Financial interests or hold official positions in Extramural Organisations, whether or not they have undertaken to perform continuing work or services for them. Such economic or official relationships are of concern if:
- a) The Extramural Organisation is engaged in activities that parallel the activities in which the University is currently or prospectively engaged, and in which the Academic Staff play or may play a role in their academic and administrative capacity, as applicable; or
 - b) The Extramural Organisation has a present or prospective relationship with the University, e.g. as suppliers of goods or services or as parties to research contracts and the Academic Staff may participate in the conduct of those relationships.
28. Full-time Academic Staff interested in an Extramural Organisation as described in paragraph 27 must promptly declare their interests in the organisation (in accordance with paragraphs 58 to 62) and recuse themselves from any SMU matter(s) to which the conflict pertains.
29. It is assumed in paragraphs 27 and 28 that Academic Staff who are not on full-time appointment will not normally participate in University decisions that could engender such conflict of interest for them. However, when this scenario is not present, the policy set out in that paragraph will apply to such Academic Staff.

Acceptance of Engagements through Extramural Organisations

30. Full-time Academic Staff who wish to undertake engagements through Extramural Organisations that are or might be appropriate for execution within the University



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 11 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

must first offer the engagement to the University if they would assume one or both of the following relationships to the engagement:

- a) Owner, executive or other principal decision-making position responsible for the conduct of that business enterprise;
 - b) Principal investigator or other substantial responsibilities for the satisfaction of the engagement.
31. The offer made pursuant to paragraph 30 shall be accompanied by a written disclosure of the nature and terms of the proposed engagements and reasons why it should be conducted as an extramural activity. If the Dean in consultation with other relevant offices in the University agrees that the engagement is not appropriate as a University activity, and is satisfied that the other conditions of the extramural consulting policies of the University will be met, then the full-time Academic Staff will be advised to proceed. Otherwise, the Dean in consultation with other relevant offices may require that the engagement be conducted within the University.

Specific Policies relating to Private Education Institutions

32. In the case of any proposal by a full-time Academic Staff engaging in any extramural activity involving private education institutions ("PEIs") regulated under the [Private Education Act](#) (Cap 247A, 2011 Rev Ed) (as amended from time to time), the following rules will apply:
- a) Permission will not be granted for any full-time faculty member to serve in a paid or unpaid position of any PEI, except where the extramural request is for serving at a PEI where it offers MOE-subsidised courses. In such a case, any approval is subject to compliance with the terms and conditions governing extramural activities for faculty members and is also subject to any other stipulations made by the Dean and Provost. Such approval is given on a strictly case by case basis.
 - b) Permission will not be granted for any full-time faculty member to serve on a PEI Examination Board or Academic Board, whether paid or unpaid, if the



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 12 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

faculty member holds an administrative position at SMU, including Associate or Deputy Dean of the School, Director or Deputy Director of an Institute or Centre, Programme Director and other similar, or higher level, administrative appointments. This is to guard against the misconception that SMU endorses, or has a formal connection with the PEI concerned.

33. In the event that approval is granted for a full-time faculty member to serve on a PEI Examination Board or Academic Board, such permission is conditional upon full compliance with the terms and conditions governing extramural activities for faculty members, and to any other condition specified by the Dean and the Provost.
34. In considering whether to grant the requisite approval for a full-time faculty member to serve on a PEI Examination Board or Academic Board, the Dean and Provost will consider the following:
 - a) The quality and credibility of the PEI.
 - b) The undertaking that the faculty will serve in a PEI in his personal capacity and not use his or her SMU affiliation, title, email or letterhead in connection with the PEI or in the PEI's advertisement, collaterals and certificates and in such other manner that is not expressly permitted by SMU.
 - c) Any matter of general probity or potential conflict of interest.
35. While paragraph 32 does not apply to Associated Faculty who are appointed for less than 12 months, any service rendered to a PEI, whether paid or unpaid, can only be rendered in their personal capacity. They are not permitted to use their SMU affiliation, title, email or letterhead in connection with the PEI or in the PEI's advertisement, collaterals and certificates and in such other manner that is not expressly permitted by SMU.

Disclosure of University Affiliation in Publications of Extramural Organisations

36. Academic Staff who form or associate with Extramural Organisations should exercise particular care that their University affiliation is appropriately cited in publications



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 13 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

of such organisations. They should ensure, for example, that the disclosure of affiliation does not create the impression that:

- a) the organisation has, by reason of the participation of Academic Staff, any formal or informal relationship with the University; and
- b) the Academic Staff, by reason of their positions in such organisations, owe duties and responsibilities to those organisations that would be inconsistent with their primary duty to the University.

Disclaiming University Relationships

37. An Extramural Organisation, with which an Academic Staff has a connection, may release to the public from time to time publications concerning itself and its activities. In all such publications it may be desirable and, in many cases, may be required by applicable law or regulations that an Academic Staff's affiliation with the University be disclosed.
38. The impact of such disclosure will depend on the circumstances. At one extreme, an Academic Staff might serve as a member of the board of directors of an established organisation, where there is not even a remote implication that such organisation is in any way connected with the University. At the other extreme, all or a large number of the principals of an organisation (officers, directors, promoters and substantial shareholders) may be Academic Staff. In such cases, there is a strong implication that the organisation may be connected with the University, even that the University bears some responsibility for its activities and success. In these cases, an express statement of the form, "*The _____ has no connection, directly or indirectly, with the Singapore Management University*" in prominent type, should be included in all publications released by such organisation. The Provost will have the power to require such Academic Staff to include such a statement in all organisational publications that refer to the Academic Staff, when it is in his or her judgment necessary.
39. For avoidance of doubt, the clauses on "*Disclosure of University Affiliation in Publications of Extramural Organisations*" and "*Disclaiming University Relationships*"



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 14 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

extend to all Academic Staff (whether they are on full-time or not), when their association with the University is mentioned in an organisational publication.

Conflict of Interest in Externally Sponsored Research

40. The University encourages its Academic Staff, including those who are not on full-time employment, to participate in externally sponsored research projects whether supported by government agencies, foundations, associations, or other non-profit organisations; or by corporations, partnerships or other for-profit entities. In any sponsored project, full-time Academic Staff are expected to avoid use of the project resources for their private financial gain other than in the form of salary support or of royalties resulting from commercialisation of intellectual property rights in accordance with University policies.
41. However, there may be unusual circumstances where the interest of the University would be served if an Academic Staff's participation in a sponsored project were to assume an entrepreneurial role, as, for example, by direct participation in a private enterprise providing funds in support of the project. Assumption of such a role would not be a violation of this policy if approved in advance and reviewed periodically by the Dean and the Provost and such interest is declared (in accordance with paragraphs 58 to 62). The approval of such a role presupposes, however, that the Academic Staff would conduct the research in a manner consistent with the interests of the University. Examples of situations from which conflict of interest may arise include, but are not limited to, the following:
 - a) Undertaking or orientation of sponsored research to serve the needs of a private agency or enterprise in which the Academic Staff has a Financial interest or other personal interest.
 - b) Purchase of major equipment, instruments, materials or other items for externally sponsored research from any agency or enterprise in which the Academic Staff has a Financial or other personal interest.
 - c) Acceptance of any limitations on the free publication of and access to the results of any sponsored research. Generally, those wishing to engage in



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 15 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

research of a kind whose results cannot be so disseminated may do so as an extramural consulting activity. Exceptional cases, such as research with government agencies or other research of a sensitive nature, may be carried out as externally funded research with the approval of the Dean.

- d) Transmission to any private agency or enterprise, use for personal gain, or other unauthorised use of the work, product, results, materials, records, or information gathered from sponsored research that is not made generally available through publication or other free access.
- e) Acceptance of gratuities or special favours from a private agency or enterprise with which the University conducts business in connection with a sponsored research project.

Disclosure to Responsible University Officials

42. Before participating in any sponsored research project, all full-time Academic Staff must give written notice of their extramural consulting relationships or other sponsored research projects that may relate in any way to the project to the Office of Research and Technology Transfer (ORTT), where appropriate and their Dean and through him or her, to the Provost. Any Financial or managerial interests that may relate in any way to the project must be disclosed in writing to the Provost. Any full-time Academic Staff engaged in sponsored research projects must disclose in the same manner any change in their outside activities or interests. If such interests arise in the midst of the research project, the Academic Staff must halt his/her participation in the research project and promptly make such disclosure to his or her Dean. In the light of such disclosures, the University will take appropriate steps to eliminate, mitigate, manage, or neutralise potential conflict of interest. For research involving human participants, the University may take additional steps in accordance with the [Institutional Review Board \(IRB\) Handbook](#).

Distribution of Effort

43. The sponsoring agency supporting research must not be misled as to the amount of intellectual effort that full-time Academic Staff are actually devoting to these research projects. A system of precise time accounting is incompatible with the



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 16 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

inherent character of the work of full-time Academic Staff, because the various functions that they perform are closely interrelated and do not conform to any meaningful division of a standard work week. However, if externally sponsored research agreements provide that full-time Academic Staff will devote a definite fraction of effort to the projects, or if it is agreed that they will assume specified responsibilities in relation to such research, demonstrable relationships between the stated efforts or responsibilities and the actual extent of their involvement are to be expected. Each full-time Academic Staff, in such circumstances, will confirm the fraction of effort devoted to the projects in the effort reports required of all Academic Staff who are so engaged.

Use of University Resources

44. University resources are to be used only in the interest of the University. Academic Staff may not use University resources, including facilities, personnel, equipment, or confidential information, for any external consulting activities or for any other non-University purposes. The following are some examples of inappropriate use of University resources:
- a) An Academic Staff assigning students, staff, or postdoctoral scholars University tasks to advance the staff's own monetary or other personal interest rather than to advance the scholarly field or educational needs;
 - b) Granting external parties access to the University's programmes, resources, services, information, or technology for purposes outside the University's mission;
 - c) Offering inappropriate favours to external parties with the intent of influencing their dealings with the University; and
 - d) Using confidential information acquired through conduct of University business or research activities for personal or third party gain.



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 17 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

Procurement of Goods & Services

45. SMU operates a procurement process which is fair, transparent and able to withstand probity. In view of this, further to Interest in an Enterprise or Society, the University requires that any Academic Staff involved in any stage of the procurement process (such as sourcing, qualification, evaluation and appointment of University vendors) declare to their Dean or to the Provost, as appropriate, any actual, potential or perceived conflict of interest in accordance with the principles set out in this policy. "University" shall include any subsidiary of the University. (Refer to *SMU's Procurement Information Site* for more details.)

Individual Gifts

46. In order to avoid any actual, potential or perceived conflict of interest, at no time should an Academic Staff solicit or accept a gift and/or advantage from any person or organisation either having or potentially having official dealings with the University, including vendors, contractors or their agents.
47. Academic Staff must firmly refuse and return, whenever possible, any gift and/or an advantage referred to any person or organisation.
48. In situations where it would be impracticable and/or impolite to decline the offer of a gift and/or an advantage, the staff must immediately notify his or her Dean, who will direct the gift and/or advantage to be processed by the Office of Human Resources & Faculty Administration through the "*Gift Declaration Form*". The recipient may retain the gift or accept the advantage on payment of full valuation to the University and after making the necessary declarations.
49. Where the gift or advantage is not of significant value (that is, less than \$150) and the gift is given to the recipient in his or her individual capacity, declaration is not required but only if such gift or advantage is not given, either expressly or impliedly, to influence the discharge of his/her official duties, e.g. seeking business or employment from the University.



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 18 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

Teaching of Family and Other Close Relations

50. All Academic Staff are required to treat all students professionally, equally and fairly, regardless of their personal relationship with them. It is important to uphold this principle of integrity, and to protect staff from allegations of bias or unfairness (actual or perceived).
51. In order to achieve the objective evaluation of degree-seeking students and to avoid the perception of bias, an Academic Staff is strictly prohibited from teaching their own family members in degree courses offered by SMU. Further, an Academic Staff should not be teaching a student who is a close friend or is a child of a close friend or is a person with whom the Academic Staff has a close relationship. If an Academic Staff has a family member or a close friend or the child of a close friend enrolled in his/her class or is of the view that teaching a particular student may pose a conflict of interest (whether actual or apparent), he/she should alert the relevant School offering the course prior to the start of the academic term, so that alternative arrangements can be made to enable the student to enrol in another course or class.
52. Under extraordinary circumstances, where an alternative arrangement is not possible or practical, such as where the Academic Staff is teaching a compulsory course and there is no other class offered in that particular semester, being the student's graduating semester, the School should appoint another Academic Staff to oversee and ensure that the grading of all assessment components of the student in question is fair, and the standards are applied in parity with other students in the same class.
53. This policy operates without prejudice in accordance with the "*General Code of Conduct*", Part VII, Section 2.1 of the Handbook.
54. Teaching staff are required to declare their personal interest if they are teaching a student (undergraduate/post-graduate) with whom they have a family/close relationship, and/or are involved or may potentially be involved in some way in a course taken by the student in terms of administration (including student evaluation/grading, academic oversight, and any form of contact, including visual, access to quiz/test/exam questions and answer scripts), etc.



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 19 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

55. Teaching staff who do not fall under the above conditions do not need to make the declaration. However, they are required to make the requisite declaration immediately if the circumstances change such that the conditions apply to them.

Employment of More than One Family Member

56. University policy permits the employment of more than one Family Member whether or not the persons concerned are in the same School or academic or administrative department. The University's primary concern in such cases of appointment, as in all others, is that faculty or staff members are the best candidates with respect to the requisite qualifications for employment. The University has a parallel concern, however, in the avoidance of a conflict of interest or the appearance of such conflicts, where an employee's professional decisions or actions pertaining to the performance of his job would be coloured by considerations arising from a family relationship with another employee. The University also recognises that the appointment of two or more family members, especially within the same area/discipline, could generate pressures and prejudice among colleagues. To guard against such conflicts and abuses, the following rules must be observed:
- (i) All Academic Staff should take care to avoid conflict of interest or the appearance of such conflicts in the employment of, and in any ongoing University-related professional relationship with a family member.
 - (ii) Except with the approval of the Provost, no Academic Staff will participate in any way whatsoever in the decision to employ, promote, reappoint, or terminate the appointment of a Family Member.
 - (iii) Any proposal to employ a person who is related to any other Academic Staff or administrator must be brought to the attention of the Dean, the Provost and Vice President, Human Resources and Faculty Administration (VP, HRFA) before an offer of appointment is made. In cases where there is a potential conflict of interest in the professional relationships of family members or with respect to other employees of the University arising from the family relationship, the Dean must outline in writing the steps being taken to avoid or manage conflict of interest or the appearance of such conflicts, subject to



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 20 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

approval by the Dean. Deans will report such arrangements to the Provost and VP, HRFA in the course of normal administrative oversight.

- (iv) No Academic Staff will participate in any other decision, including determining the salary, teaching and/or administrative assignments, and space assignments, directly and individually affecting a member of his or her family on the faculty or associated faculty. In such cases, the Provost or Academic Staff's Dean / HOD will make such decisions.
57. These requirements set out in paragraph 56 above extend to all full-time Academic Staff, whenever such a person may exercise decision-making power over the employment and/or administration of a Family Member employed by the University.

General Disclosure Obligations

(a) Annual Declaration of Interests

58. All Academic Staff must declare at least annually their compliance with provisions of this policy. The University will send out a reminder to all staff to complete (including nil returns) the annual Code of Conduct and Conflict of Interest declaration forms by HRFA. Where neither a conflict of interest declaration nor a "nil" return submission has been made by an academic staff, it shall be deemed as a "nil" return submission by the staff and recorded accordingly for official purposes, that the staff has no conflict of interest to declare.
59. In the event of an investigation, the burden of proof will be on the academic staff to prove that he or she is or was not in any actual or potential conflict of interest or in a situation that may give rise to a perception of a conflict of interest.
60. Many situations will require nothing more than a declaration and a brief written record of that declaration, which must be held in a School's records and which should be provided to the Disciplinary Committee upon request.



Issue Date : 1 Jan 2011
 PART : II
 SECTION : 2.7
 Revision No. : 3
 Revision Date : 1 Jul 2021
 Page : 21 of 21

SMU GOVERNANCE & ACADEMIC POLICIES HANDBOOK

Title: Conflict of Interest Policies for All Academic Staff
--

Approved by: SMU Board of Trustees

(b) Ad Hoc Disclosures

61. Academic Staff have a duty to disclose to the School Dean on an ad hoc basis current, proposed or pending situations that may raise questions of Conflict of Commitment or Conflict of Interest, in advance of the conflict arising if possible, and otherwise as soon as such situations become known to the staff. Each time an Academic Staff proposes to engage in a transaction with a person or organisation as to which the staff would have a conflict of interest as described in this policy, the staff must disclose the matter to the School Dean/HoD on an ad hoc basis and must declare in the Conflict of Interest declaration forms by HRFA.
62. Conflicts must be disclosed in writing; and any waiver of the conflict or management plan must be recorded in writing.

Advice and Guidance

63. Any questions concerning potential conflict of interest, appropriate distribution of effort, or other problems associated with externally sponsored research, should be addressed to the Office of the Provost.