

**Guideline nae: Regulations Concerning Conflicts of Interest in Research**

---

**1. General:**

Tel Aviv University Researchers will conduct their Research in an impartial manner and will act solely based on professional considerations.

Tel Aviv University Researchers will disclose any matter which could have, or could appear to have, any influence on the Research or any improper effect on decisions concerning the manner in which the Research is conducted. Such disclosure will allow the proper measures to be taken to ensure the Research is conducted impartially, independently and professionally.

**"Research"** – Any research conducted at Tel Aviv University, its subsidiaries and/or external institutes and/or on behalf of Tel Aviv University and/or which is coordinated by Tel Aviv University.

**"Tel Aviv University Researchers"** – Are the employees, pensioners, guests, students and post-doctoral fellows of Tel Aviv University, involved in any Research, including as part of their studies towards a degree, in planning Research, in submitting Research proposals in order to obtain funding, in conducting research or in reporting it, or in decisions regarding its commercialization, and any person using University resources and/or involved in Research with any of the aforementioned individuals.

It is hereby clarified that external bodies procuring laboratory services are not bound by these regulations, and do not take part in University Research.

Anything appearing in the masculine form in these regulations shall also include the feminine form, and anything appearing in the singular form shall also include the plural form, and vice versa.

**2. What constitutes a conflict of interest in Research?**

A conflict of interest in Research arises whenever there is a concern that any foreign consideration will influence the independent and professional judgement required in Research.

A conflict of interest may be real or potential.

For the purpose of determining whether a conflict of interest exists: it is sufficient if a situation in which there would be a concern regarding the existence of a conflict of interest could arise, this based on objective data and on reasonable considerations founded on life experience and common sense. The Researcher's personal feelings regarding the degree of influence the foreign considerations may have is irrelevant.

A real or potential conflict of interest:

**A real conflict of interest** is a situation in which there is an actual real possibility that the independent and professional judgement needed for academic Research will be influenced by foreign considerations.

**A potential conflict of interest** is a situation in which it seems that the Researcher's independent and professional judgement could be influenced, or a situation which could develop into a real conflict of interest.

"Foreign Considerations" could be of any type – personal, professional, financial, commercial or anything else. The considerations may be the Researcher's own, or those of their close relatives, close friends, financing entities or any other person or body.

**Guideline nae: Regulations Concerning Conflicts of Interest in Research**

---

Some typical, but not exclusive, situations in which conflicts of interest may arise are:

- 2.1 A real conflict of interest, which must be disclosed and managed (see Section 4 below), exists when a Researcher (or their close relatives, close friends, students or any other person or body with whom they have a relationship) is related to the entity funding the Research in a manner which allows them to gain a direct or indirect financial profit. Even when there is no actual possibility to gain a financial profit, a potential conflict of interest, which must be disclosed and managed, may still exist (and this is also true when one of the aforementioned individuals considers entering into a relationship with the funding entity).
- 2.2 When the entity funding the Research has a financial interest, or any other interest which is not academic, in the results of the Research, such as their commercialization, a real conflict of interest will not necessarily always exist, but there may be a potential conflict of interest which must be disclosed and managed.
- 2.3 When the funding entity or the Tel Aviv University Researcher (or their close relatives, close friends or students) or any entity with which the Tel Aviv University Researcher has a relationship or in which they have an interest, are interested in or may benefit from postponing the publication of the results of the Research, or from publishing partial or misleading results or from withholding their publication altogether, there is a real conflict of interest which must be disclosed and managed.

For the avoidance of doubt, any partial publication or decision to withhold the publication of Research results based on the Tel Aviv University Researcher's professional-academic considerations shall not constitute a conflict of interest on their own.

- 2.4 When a significant private profit or a personal or professional benefit (which goes beyond normal professional advancement) depend on the Research results, there is a real conflict of interest, which must be disclosed and managed.
- 2.5 Cases in which a person involved in the Research has a personal interest which may be affected by the execution of the Research or by its results.

"Personal Interest" – Including a personal interest of their relatives or an interest of an entity which the Researcher or their relatives manage or in which they are members or employees or officers, or an interest of an entity in which either of them owns a portion of the share capital, a right to receive profits, a right to appoint directors or any voting rights. For the avoidance of doubt, it is clarified that minimal holdings in corporations whose shares are publicly traded in a stock exchange, whether directly or indirectly, as part of securities portfolios and/or trusts, pension funds and so on, as is common practice by ordinary members of society, will not be considered as a personal interest.

**3. General duties:**

- 3.1 The independent, professional and impartial judgement required from an academic Researcher shall not be influenced by foreign considerations.
- 3.2 The Tel Aviv University Researchers will uphold the disclosure duties detailed in these regulations and will comply with the resolutions of the Conflict of Interest Committee.

**4. Disclosure duties:**

**4.1 Disclosure at the time of submission of Research funding requests:**

Every Research proposal submission form submitted to the Research Authority will include a declaration provided by the Chief Researcher concerning the absence of any conflict of interest, as detailed in the form, in relation to all Tel Aviv University Researchers involved in the Research.

The Chief Researcher will ensure that all those collaborating with them and/or acting on their behalf in the Research have signed and/or will sign (once their involvement in the Research begins) in person on the declaration, made out in the format attached as **Appendix A**, and will keep their declarations for documentation and auditing purposes, for a period of at least two years from the end of the Research.

**Guideline nae: Regulations Concerning Conflicts of Interest in Research**

---

Any real or potential conflict of interest formed during the Research will be immediately reported to the Conflict of Interest Committee.

**4.2 Discloser by a doctoral student:**

The declarations provided by the student and their dissertation supervisor in relation to the proposed Research, their understanding of the rules and their undertaking to follow them, shall be attaches to the application for studies and to the application for the approval of the Research proposal, which are submitted to the Graduate Student Department. The format of these declarations is hereby enclosed as **Appendix B.**

Should the departmental committee discussing student admissions or an application to approve a Research proposal find that there is a concern regarding a conflict of interest, the general University Graduate Student Committee will make the final decision concerning this matter. This committee will also be authorized to examine situations when a concern regarding a conflict of interest arises during the graduate student's studies.

**4.3 Ad hoc declarations:**

Tel Aviv University Researchers will pro-actively disclose to the Conflict of Interest Committee any real or potential conflict of interest which arises during their Research or which was not disclosed in the Research funding request, or that has changed since its disclosure.

The conflict of interest will be reported immediately upon being formed.

**5. Consultation:**

Tel Aviv University Researchers may consult the Conflict of Interest Committee in order to ascertain if a situation they encountered constitutes a real or potential conflict of interest and learn how this situation may be avoided or managed.

**6. Records:**

The Chief Researcher declarations detailed in Section 4.1 and the declarations detailed in Section 4.3 above, the petitions to consult the Committee and any documentation related to the work of the Conflict of Interest Committee will be filed and kept by the Research Authority, and any other authority authorized to handle matters relating to conflicts of interest and violations of university rules will be authorized to view them.

The declarations detailed in Section 4.2 will be filed in the student's personal file kept by the office of the unit in which they study.

**7. The Conflict of Interest Committee:**

**7.1 Composition of the Committee:**

The Committee is comprised of 7 members: The Vice President of Research and Development will serve as the Chairman of the Committee, 4 members at the rank of Professor, representing different fields of Research at the University, a public figure and the Director of the Research Authority. The Director of the Research Authority will serve as the Committee Coordinator. A representative of the Ramot Company will be invited to serve as an observer on the Committee (without voting rights).

7.2 The Rector will appoint the members of the Committee who are not appointed by virtue of their position, including the public figure. The appointment will be for a three-year period and may be extended by three additional years. The appointment will require the approval of the Coordinating Committee.

7.3 In order to ensure the continuity of the work of the Committee, no more than 30% of the Committee members may be replaced at one time.

7.4 The number of committee members required for a legal quorum to be formed is 5.

**Guideline nae: Regulations Concerning Conflicts of Interest in Research**

---

**8. The activities of the Conflict of Interest Committee:**

- 8.1 The Conflict of Interest Committee will examine any case brought to its attention, whether by the Research Authority (following funding requests submitted by Researchers) or by way of a disclosure made by a Tel Aviv University Researcher or as a result of a Tel Aviv University Researcher consulting with the Committee, and will decide on the appropriate course of action.
- 8.2 The Committee may decide as follows:
- (1) That the situation does not require any special treatment.
  - (2) That the relevant Tel Aviv University Researcher must disclose the conflict of interest to other individuals or bodies, as the Committee sees fit.
  - (3) That the Research plan must be changed in such a manner that would prevent the conflict of interest from rising or would allow it to be managed.
  - (4) That an individual must be appointed to independently audit the planning, conducting or reporting of the Research.
  - (5) That the Tel Aviv University Researcher must release themselves from a financial interest in the entity funding the Research or in an entity which has a non-academic interest in the results of the Research.
  - (6) That the Tel Aviv University Researcher must disassociate themselves from the individual or entity which gave rise to the conflict of interest.
  - (7) That the Tel Aviv University Researcher should be disqualified from participating in the Research or from any part of it.
  - (8) That any other measure which the Committee deems fit should be taken in order to avoid any conflict of interest or in order to manage it.
  - (9) To submit its recommendation concerning the initiation of a disciplinary procedure to the Rector.
- 8.3 Before the Committee reaches its decision concerning the existence of a real or potential conflict of interest which requires management, and regarding the proper means for its management, the Committee will hear the position of the Tel Aviv University Researchers involved regarding the relevant situation and regarding the appropriate means for managing it, should they wish to offer their position. In special cases, Tel Aviv University Researchers will be allowed to present the opinions of others to the Committee, whether orally or in writing.
- 8.4 When coming to decide whether a real or potential conflict of interest which requires management exists, and on the proper means required in order to manage it, and in any case these rules do not explicitly stipulate any other arrangements, the Committee will be guided by the standards in common practice by academic institutes in Israel and abroad in relation to such matters.
- 8.5 All Committee sessions, including those attended by a Tel Aviv University Researcher, excluding preliminary clarifications and exchanges of opinions, will be conducted in person, and not in writing or by email. At the same time, a Tel Aviv University Researcher will be allowed to present their position also in writing should they choose to do so. The content of the sessions will be recorded and retained.
- 8.6 All Committee resolutions will be given in writing. Committee resolutions and the records of its sessions and deliberation process will be made available to the members of the Committee and to the Researcher whose matter is heard, at their request.

**Guideline nae:                    Regulations Concerning Conflicts of Interest in Research**

---

8.7 When coming to decide whether a real or potential conflict of interest which requires management exists, and on the proper means required in order to manage it, the Committee may pass provisional resolutions as it sees fit, such as suspending the Researcher from any involvement in the Research, disclosing the situation to the entity funding the Research, freezing the Research funds and so on, all until a final resolution is passed.

This power will not be exercised without the Researcher being granted an opportunity to be heard, and no action which may unnecessarily damage the advancement of the Research or the relationship between the Researcher and the funding entity will be taken.

8.8 Appeals against Committee resolutions will be heard by the Committee with the addition of two members: The Rector of the University and the Chairman of the University Ethics Committee. The minimal number of members required for a legal quorum to be formed is 7 members holding voting rights, including the Committee Chairman and the two additional members.

8.9 Should the Rector receive a complaint concerning any violation of the provisions set forth in these regulations, they shall forward the complaint to the Committee, who will investigate it and submit its recommendations to the Rector.

8.10 The resolutions passed by the Conflict of Interest Committee will be binding for all Tel Aviv University Researchers.

**9. Additional rules:**

9.1 Any information provided to the Research Conflict of Interest Committee by a Tel Aviv University Researcher will be kept in confidence.

9.2 The existence of university rules addressing other matters related to the commercialization of Research, such as rules addressing the relationship between an academic worker and a business entity and rules addressing the utilization of inventions and patents, does not exempt the Tel Aviv University Researcher from upholding their obligations pursuant to these Regulations.

In addition to the provisions set forth in this procedure, Tel Aviv University Researchers shall also comply with any requirement posed by the entities funding their Research, in relation to conflicts of interest and their disclosure (such as requirements posed by the American Government).

---

Guideline nae: **Regulations Concerning Conflicts of Interest in Research**

---

## Appendix A

### Tel Aviv University

#### Declaration of an Individual Participating in Research Regarding:

#### Proper Research Conduct and Conflicts of Interest

Name: \_\_\_\_\_ Position: \_\_\_\_\_

Telephone: \_\_\_\_\_ Email: \_\_\_\_\_

Chief Researcher: \_\_\_\_\_ Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

Name of Research this declaration refers to: \_\_\_\_\_

---

**By affixing my signature below, I hereby declare as follows:** (Please mark the sections relevant to your declaration with an "X").

I have read the "Proper Research Conduct Regulations" and the "Regulations Concerning Conflicts of Interest in Research" and have understood the obligations imposed on me under them.

The Chief Researcher has informed me of the Rules Concerning Conflicts of Interest in Research, and I confirm that they are clear to me and that I have understood them.

- I am not nor do I expect to be in a conflict of interest in relation to this Research.
- I am and/or I expect to be in a conflict of interest in relation to this Research, as detailed below:

\_\_\_\_\_

Date \_\_\_\_\_ Signature \_\_\_\_\_

\* This declaration shall be kept by the Chief Researcher for documentation and auditing purposes for a period of at least two years.

Guideline nae: **Regulations Concerning Conflicts of Interest in Research**

---

## Appendix B

### Tel Aviv University

#### Declaration of a Graduate Student Regarding:

#### Proper Research Conduct and Conflicts of Interest

Name of student: \_\_\_\_\_ Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

Name of Supervisor: \_\_\_\_\_ Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

Name of the dissertation which this declaration refers to (assuming a name exists):

\_\_\_\_\_

---

**By affixing my signature below, I hereby declare as follows:** (Please mark the sections relevant to your declaration with an "X").

I have read the "Proper Research Conduct Regulations" and the "Regulations Concerning Conflicts of Interest in Research" and have understood the obligations imposed on me under them.

The dissertation supervisor has informed me of the Rules Concerning Conflicts of Interest in Research, and I confirm that they are clear to me and that I have understood them.

- I am not nor do I expect to be in a conflict of interest in relation to this Research.
- I am and/or I expect to be in a conflict of interest in relation to this Research, as detailed below:

\_\_\_\_\_

Date \_\_\_\_\_ Signature \_\_\_\_\_

Guideline name:                    **Regulations Concerning Conflicts of Interest in Research**

---

**Declaration of a Dissertation Supervisor Regarding:  
Proper Research Conduct and Conflicts of Interest**

**By affixing my signature below, I hereby declare as follows:** (Please mark the sections relevant to your declaration with an "X").

I have read the "Proper Research Conduct Regulations" and the "Regulations Concerning Conflicts of Interest in Research" and have understood the obligations imposed on me under them.

I have informed the student of the Rules Concerning Conflicts of Interest in Research and they have confirmed to me that they are clear to them and that they have understood them.

- I am not nor do I expect to be in a conflict of interest in relation to this Research.
- I am and/or I expect to be in a conflict of interest in relation to this Research, as detailed below:

\_\_\_\_\_

Date \_\_\_\_\_ Signature \_\_\_\_\_