



Directorate of Strategic Planning and Quality Assurance  
(SPQA)  
University of Sierra Leone

## **University of Sierra Leone Conflict of Interest Policy**

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### **A: Policy Statement**

1. The University of Sierra Leone (USL) is committed to ensuring that high levels of integrity apply in all areas of its operation and that all activities are conducted in an honest and transparent manner. The aims of this Policy are to:

- enable staff, students and external stakeholders to recognise where their personal interests conflict with or may reasonably be perceived to conflict with their University duties (see Section C);
- communicate the expectations for declaring and recording such conflicts (see Section D); and
- set out the processes for managing conflicts of interest in order to ensure that business decisions are made objectively and in the best interests of the University (see Section E).

2. A conflict of interest exists when the duties owed by an individual to the University conflict with, or may possibly conflict with a personal, financial or other interest or duty that the individual holds and/or with the interests of someone who has a close personal connection to the individual (including, but not limited to, any children, in-laws, siblings, partner or spouse).

3. The governance of the University, through its committees, must be conducted in accordance with this Policy. Therefore, in addition to applying to all staff, the Policy also applies to student and external committee members (see Section F for a summary of responsibilities).

## **B: Individuals to Whom this Policy Applies**

4. This Policy applies to all University staff, and to students and stakeholders of University or equivalent bodies, such as working groups. For the purposes of this Policy:

- reference to the 'University' include reference Fourah Bay College (FBC), the Institute of Public Administration and Management (IPAM) and the College of Medicine and Allied Health Sciences (COMAHS).
- 'staff' refers to all individuals working within the University at all levels and grades (whether paid or unpaid), including employees (whether permanent, fixed-term or temporary), other visiting research or teaching staff, workers, trainees, seconded staff, agency staff, agents, volunteers, interns or any other person working in any context within the University.

## **C: Defining and Recognising Conflicts of Interest**

5. A conflict of interest exists when the duties owed by an individual to the University conflict with, or may possibly conflict with a personal, financial or other interest or duty that the individual holds and/or by the interests of someone who has a close personal connection to the individual. The existence of a conflict of interest does not therefore depend on whether the individual is actually influenced in their duties or decisions. It arises whenever an interest could reasonably be perceived as affecting, or having the capacity to affect, an individual's ability to make impartial decisions on the University's behalf.

6. A potential conflict exists where the interests of an individual are not currently in conflict, but there is a reasonable likelihood that they may give rise to a conflict in the future. For example, where a member of staff is a trustee a college that is not currently linked or affiliated to the University, or seeking collaboration with the University, but that college has an interest in research and is known to regularly seek collaborations with universities.

7. Conflicts of interest can arise both from roles or activities involving parties outside the University or where staff and other committee members hold multiple roles inside the Collegiate University. Conflicts may arise from activities such as procurement, commercial transactions, conduct and funding of research, contractor selection, admissions and recruitment.

8. Conflicts of interest can be financial or non-financial:

- Financial conflicts can arise where there is, or appears to be: opportunity for personal financial gain; financial gain to someone with a close personal connection to the individual; or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions. Examples include payments, benefits in kind, equity interests, gifts, hospitality or intellectual property rights.
- Non-financial interests may include any direct or indirect benefit or advantage, enhancement of an individual's career or education or gain to a connected person. Staff and other committee members should therefore consider who they are acting for, and whether there are any competing motivations or interests that could influence them, or be seen to influence them.

9. Examples of areas where conflicts are particularly likely to occur in the university environment and ways to manage these conflicts.

- A staff member who has a close personal or familial relationship with a student or a person connected to the student and who may be involved in decisions about the student's admission, supervision or academic progress, or the award of studentships, prizes or grants to the student.
- A researcher whose work is funded by a company and who has a financial interest in the company sponsoring or funding their research (or the research of a supervisee). This is exacerbated if the researcher's interest may be affected by the outcome of the research.
- A researcher who holds a position in an enterprise (e.g. as Director) that is funding research at the University and which may wish to restrict (or otherwise manage) research findings for commercial reasons, or not wish to publish the results of the research.

## **D: Declaring and Recording Conflicts of Interest**

10. Individuals must disclose all conflicts of interest in writing at the time the conflict first arises or becomes known, including when it is recognised that a conflict might reasonably be perceived. Conflicts of interest should be disclosed during any activity. If the recipient of the disclosure has an interest in the matter being disclosed, they should refer the disclosure to the group concerned.

11. 'Declarations of interest' should be a standing item at the beginning of every meeting so that attendees can declare any conflicts of interest in relation to that specific agenda. The Chair will decide on the course of action for managing each conflict. Both the declarations and any mitigating actions should be minuted.

12. In addition to declaring conflicts of interests to who ever ids concerned in relation to specific agenda item(s), decision-making bodies are required to declare their interests annually via an online declaration of interests form which will be issued by Strategic Planning and Quality Assurance Directorate.

## **E: Managing Conflicts of Interest**

14. The Head of the Institution or Chair of the meeting should decide on the course of action for each conflict that is declared to them.

15. Chairs of meeting will decide whether any action is necessary to manage each interest which their members or regular attendees disclose via the annual declaration of interest form.

16. In some situations simply disclosing and recording the interest may be the only necessary action.

17. In other cases, in order to ensure that decisions are made in a fair and transparent way, more active management may be required. This will depend on the nature and context of the interest, but could include:

- not taking part in discussion of certain matters and any decisions/votes relating to those matters;
- not taking part in decisions relating to certain matters, but still being present for any preceding discussion;
- referring decision-making on certain matters to others;
- agreeing not to act as a particular person's supervisor;
- divesting or placing in trust certain financial interests;
- publishing a notice of interest;
- standing aside from any involvement in a particular project;
- declaring an interest to a sponsor or third party.

18. All departments / units induct their staff on the content of this policy.

19. The actions should be reviewed annually by the Head of the Institution or committee Chair as appropriate (or their nominated deputy) and updated as necessary to ensure they remain relevant. The actions should also be reviewed if the reviewer is notified of any material changes to the matter declared.

20. A conflict of interest should be avoided unless it can be properly managed using the above strategies. For example, in extreme cases, it might be necessary for an individual to resign one of the positions which is creating the conflict.

21. If the individual is not clear as to the course of action to be taken, they should contact the Strategic Planning and Quality Assurance Directorate.

## **F: Summary of Responsibilities**

22. **All staff** must disclose conflicts of interest with their University duties to their Head of Institution at the earliest opportunity.

23. **Members and attendees of the University's principal, central decision-making bodies and Head of Institutions** must declare any personal, financial or other interests (and/or those of their close personal contacts) which constitute existing or potential conflicts with their University duties. They should give notice of any changes to their interests via the form at the earliest opportunity.

24. **Heads of Departments/Units** are responsible for: ensuring that staff within their Department/Unit, students or external stakeholders are made aware of this Policy; ensuring that an up-to-date register of conflicts of interests is maintained for their institution; and for determining how to manage each conflict.

25. **All committee/meeting Chairs** are responsible for asking for declarations of interest in relation to the agenda at the start of each meeting, determining how to manage each conflict in the context of their meeting, and ensuring that the declarations and any mitigating actions are minuted.

26. **Chairs of the University's principal, central decision-making bodies** are responsible for ensuring that an up-to-date register of interests is maintained for their body, and for determining how to manage each interest.

27. **Members of the University's Court** have a legal duty to avoid conflicts of interest and to act in the best interests of the University.

28. **The Strategic Planning and Quality Assurance Directorate** is responsible for ensuring that this Policy is maintained, that appropriate explanatory guidance is provided and for monitoring compliance with the Policy.

29. **The University Court** is responsible for considering issues escalated to them by the Head of Institution or Registry and for providing recommendations if necessary.

## **G Related Guidelines and Contact for Queries**

31. The University already has guidance other , policies and procedures which include provisions for dealing with conflicts of interests in certain areas.

32. If you have any queries relating to this Policy, please contact the Strategic Planning and Quality Assurance Directorate