



KAMUZU UNIVERSITY
OF HEALTH SCIENCES

Conflict of Interest Policy

NOVEMBER 2023

Policy Name	Conflict of Interest Policy
Policy No.	PL/C.3A.4
Effective Date	
Last Review	
Next Review	Every five years
Council Approval Date	17 April 2024
Stakeholders Subjected to this Policy	Council members and members of Council committees; all staff; researchers; members of, or assessors in, disciplinary tribunals, Student leaders/or any other parties with business interest with the University.
Responsible Officer(s)	Registrar, Executive Deans, Line Managers
Responsible Office(s):	Vice Chancellor

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5. FOREWORD

KUHeS is committed to advancing frontiers of knowledge, educating the next generation of healthcare professionals, and providing quality healthcare services. In pursuit of these goals, maintaining the public's trust is of paramount importance. In the course of our work either as council or employees, we inevitably come across issues that are potentially conflict of interest. It is because of such scenarios that this policy was developed to enable council members provide a comprehensive disclosure of their financial interests and fiduciary roles, as well as those of their immediate family members, upon their appointment to the Council or the relevant committee. In addition, all staff members are expected to make a declaration of their financial interests and fiduciary roles, along with those of their immediate family members, upon joining the University. We commit to full disclosures, to periodic reviews and annual updates in the implementation of this Policy.

The responsibility of maintaining the integrity of our institution falls on all of us. I encourage each member of our community to play a proactive role in promptly identifying and addressing conflicts of interest. By doing so, we not only fulfill our ethical obligations, but also safeguard the reputation of KUHeS. Thank you for your commitment to uphold the values and standards that define KUHeS.



Professor Francis Moto

Chairman of Council

6. PREFACE

At KUHeS, our unwavering commitment to excellence in education, research, and service is intrinsically linked to our steadfast dedication to upholding the highest ethical standards and responsible conduct. We acknowledge that the diverse interests, roles, and relationships of our esteemed faculty, staff, students, and administrators have the potential to give rise to conflicts that could compromise the integrity of our institution.

This is why we created this policy and it applies to all members of our esteemed University community. It delineates our collective duty to identify, disclose, manage, and mitigate conflicts of interest whenever they arise. With this policy, we reiterate our pledge to cultivate a culture of trust and transparency.

We emphasize our allegiance to the values of transparency, honesty, and the responsible management of potential conflicts of interest. We remain acutely aware of the profound impact of our endeavors on society. The management of conflicts of interest is a shared responsibility, with each member of our community playing an integral role in safeguarding our institution's reputation.

As you delve into the comprehensive Policy following this preface, we implore you to reflect on the pivotal role you play in upholding our institution's integrity. By acquainting yourself with this Policy and actively participating in its implementation, you contribute significantly to the continued excellence and trustworthiness of our institution.



Professor MacPherson Mallewa
Vice Chancellor

7. ACKNOWLEDGEMENTS

This Policy is an outcome of the hard work and dedication of the following members: Ms. Sthembiso Maisha, Dr. Peter Kumpalume, Dr. Patrick Mapulanga, Mr. Samson Kalulu, Mrs. Tiwonge Mtande, Mrs. Joyce Gondwe, Mr. Msungeni Salanje, Mr. Arthur Mtegha, Ms. Khama Mita, Mrs. Violet Chikhambi Kamwendo, Mr. Wilson Kumwenda and Ms. Jane Fatsani Maganga. Finally, the University would like to acknowledge the valuable input of Management and Council in the development of the Policy.

8. ABBREVIATIONS AND ACRONYMS

KUHeS	:	Kamuzu University of Health Sciences
SRC	:	Students Representative Council
KUREC	:	Kamuzu University of Health Sciences Research and Ethics Committee

9. DEFINITIONS

Conflict of Interest : A conflict between the private interests (financial, personal, fiduciary or other) and the official responsibilities of a Council member or a staff member. For purposes of this Policy, conflicts of interest have been categorised as:

- a. Perceived conflict of interest: where it appears that the employee's private interests could improperly influence the performance of his or her duties towards the University;
- b. Potential Conflict of Interest: where an employee has private interests that could conflict with his or her official duties towards the University;
- c. Actual Conflict: where an employee's interest directly interferes with the ability to conduct his or her duties to the University in a proper manner because of their private interests.

Controlled entities : All entities that are subject to the control of the University.

Declaration of Interest: The process whereby an employee or Council member declares all interests that:

- a. pertain to actual or potential service providers of the University;

- b. may give rise to or may in future give rise to a conflict of interest between the staff member and the University; and for remuneration, excluding those activities undertaken for purposes of teaching and research.
- c. result in a member personally gaining from providing services of the University beyond his or her employment relationship with the University.

External Institutional : Activities performed outside of the

Affairs University by a staff member in exchange

Fair business practice : Business practices that will promote fair and appropriate treatment of customers and service providers alike.

External Work : Any employment or other form of paid or unpaid work that is not undertaken for the University or its controlled entities, or as part of the normal duties of the employee's role, and includes: proprietorship, directorship, trusteeship, independent contracting, consultancy in a private capacity, a governance or advisory role, and honorary, visiting or adjunct appointments to other universities or institutions.

Financial interest: Any employment, consultancy, appointment, business activity or any other right, claim, title or legal share in something that has a monetary or equivalent value. A financial interest includes, but is not limited to:

- a. the right to receive distributions from a trust,
- b. directorships or trusteeships of a trust or company,
- c. legal or beneficial ownership of a trust or company,
- d. significant shareholding (more than 5% of issued capital) in a public or private company, or a significant holding of share options or access to dividends,
- e. the right to receive remuneration or other benefits such as distributions, salaries, fees from company directorship or board membership, consulting fees, allowances or discounts,
- f. a right or benefit which has financial worth including the provision of materials, premises, facilities, equipment, time and effort of staff, information technology, intellectual property or confidential information and other resources, whether tangible or intangible, or
- g. any other source of or right to income of more than \$10,000 per annum other

than from paid employment with the University.

A financial interest does not include rights, claims, titles or legal shares in assets or rights where:

- a. the person has no direct control over the assets or rights in which the conflict of interest may arise or be perceived to arise (for example, holding shares in a large publicly listed company of less than 5% of issued capital); or
- b. the interest is so small that it could not reasonably be perceived to have any impact on the decisions or actions of the person in undertaking University matters.

Funder requirements : Any rules, policies, regulations or contractual requirements relating to private interests and/or conflicts of interest, which are imposed by externally-funded or jointly-funded research on the University, its controlled entities or the people covered by this Policy, including pre-award and post-award.

Gift : A token bestowed upon a person without expectation of tangible compensation, and in regard of which no direct or indirect contractual obligation exists, including gifts related to cultural

and hospitality practices, and those related to sporting events;

Management plan : A plan that records the management of a conflict of interest under this Policy.

Moonlighting : Taking up additional employment, which may require time investment that may impede a staff member in meeting his or her contractual obligation to the University.

Non-financial interest : Formal or informal, paid or unpaid membership, participation, activity or involvement of people covered by this Policy in any community, professional, sporting, religious or political club, party, company or other formal or informal association or group, including directorships and board or committee memberships for which the person receives no monetary benefit.

Personal gifts : A gift, or series of gifts, of the following: entertainment, hospitality, travel or other benefit or personal favour; or an item of property, whether of a personal nature or otherwise.

Personal gifts do not include catering for formal or informal meetings at the

University, farewell gifts for staff, and gifts to which fellow employees have contributed that could not be perceived to influence or be intended to influence a decision made or action taken on behalf of the University.

Personal or Special relationship : Includes:

- a. immediate family, which includes a spouse or former spouse, partner, child, parent, grandparent, grandchild or sibling of the person, or a child, parent, grandparent, grandchild or sibling of the person's spouse or step-relations (e.g. step-parents and step-children) as well as adoptive relations, close personal friend that goes beyond collegiate working relationships, romantic, intimate or sexual partner, financial dependant, or business partner which a reasonable person might perceive to influence a person's decision-making.
- b. Personal relationship includes the above relationships between two staff members, or between a staff member and a graduate or undergraduate student. May include former relationships

Does not include an ordinary working

relationship which exists due to collaboration, where the colleagues are not immediate family, close personal friends,

romantic or sexual partners, financial dependents or business partners.

- Private interests** : Include:
- a. engaging in external work;
 - b. having a financial interest;
 - c. having a non-financial interest;
 - d. having a current or past personal relationship; and
 - e. the actual or anticipated receipt of personal gifts.

They may also include the financial interests or non-financial interests of, or the actual or anticipated receipt of personal gifts by, a person with whom the person covered by this Policy has a personal relationship, where the person covered by this Policy knew or ought reasonably to have known of those interests or gifts.

- Recuse** : Self-initiated removal of a staff member from further participating in the decision-making process pertaining to a case which gives rise to a conflict of interest.

- Remuneration** : Any benefits received in cash or in kind

- Staff** : Individuals who perform various

roles and responsibilities in support of KUHeS's academic, administrative, and operational functions. Staff includes employees, volunteers and contractors.

- Student leader** : A student who is a member of the Student Representative Council (SRC).
- Technology transfer** : Includes the process of finding partners, licensees or buyers and negotiating with them the fee that needs to be paid in whatever form as well as term for any right to exploit such results. This process requires careful management and various skills to optimize the income to the University and its employees;
- University matters** : Any activity conducted by or on behalf of or reasonably connected with the University or its controlled entities, whether in-person or online, on campus or off campus, including without limitation (whether directly or through proxies or delegates
- University member** : A member of the Council, a member of a Council committee who is not a member of Council, an employee, a student or a student leader

University subcommittee: Committee established by the University Act, University Council or University Senate.

10. BACKGROUND

At KUHeS, we are dedicated to the advancement of knowledge, education of future healthcare professionals, and provision of exceptional patient care. In the pursuit of these activities, it is natural for members of our University community to be engaged in a variety of personal, financial, and professional interests and relationships. These interests occasionally intersect with their responsibilities at the University, potentially creating conflicts of interest.

A conflict of interest, in its various forms, is a situation in which an individual's personal interests or relationships may compromise the objectivity, professional judgment, or best interests of the University. When not appropriately addressed, conflicts of interest have the potential to erode public trust, compromise the quality of education and research, and undermine confidence in our services.

Recognizing the significance of addressing conflicts of interest, KUHeS has developed a Conflict-of-Interest Policy. This Policy is designed to provide a framework for identifying, disclosing, managing, and mitigating conflicts of interest when necessary. It also outlines the processes for reporting and resolving such conflicts and the consequences of noncompliance.

11. SCOPE

This Policy applies to the following people within the University and its controlled entities, in respect of all University matters:

- a. Council members and members of Council committees;
- b. All staff of the University and all joint staff
- c. Researchers undertaking research at KUHeS and/or under a KUHeS contract, grant, or other award.

- d. Honorary staff including honorary research staff;
- e. Members of, or assessors in, disciplinary tribunals.

The Policy extends to the following activities or interests of staff members, including but not limited to:

- a. Share and other financial interests in private or public companies and other corporate entities recognized by law. This requirement is only applicable to staff members who serve on Board of Trustees for the Retirement Fund and/or the Medical Aid of the University, and those who are appointed to finance positions to make financial and investments decisions for the University.
- b. Directorships or partnerships.
- c. Remunerated work outside the employee's engagement with the University.
- d. Consultancies and retainerships.
- e. Sponsorships.
- f. Gifts and hospitality from a source other than a family member and friends, which are above the threshold value.

This Policy must be interpreted and applied in a manner consistent with the –

- a. The constitution of the Republic of Malawi
- b. Corrupt Practices Act, 2014;
- c. Financial Crimes Act 2022;
- d. Public Procurement and Disposal of Assets Act;
- e. Access to Information Act 2019;
- f. KUHeS Act of 2019;
- g. Code of Conduct for Council Members;

- h. KUHeS Code of Conduct and Ethics Policy;
- i. KUHeS Financial Policy;
- j. The Constitution of the SRC of KUHeS;
- k. The Research and Consultancy Policy;

Kamuzu University of Health Sciences Research and Ethics Committee guidelines

- l. Any other applicable laws, regulations and policies.

12. RATIONALE FOR THE POLICY

This Policy and its procedures are necessary because they promote good governance and objectivity. They are also required by the National Council of Higher Education, The Nurses and Midwifery Council of Malawi and other professional regulatory bodies. The public (including research funding agencies) expects the University to conduct its business, including all research, with objectivity and honesty. All personnel at KUHeS, including academic researchers and members of management, are appointed, and elected to serve the interests of the University. As a result, they become trustees for the good of the University and the people it serves. This requires them to fulfill obligations in a way that is appropriate. The primary motivation for the work and choices made by Council members, employees, managers, and office holders should be the desire to advance the University's best interests.

For everyone to perform to the greatest standards of competence, integrity, and security and to realize their full potential, the University must uphold the integrity of the academic process. Research objectivity is required because of this *interalia*. The University acknowledges that staff members and Council members frequently have their own professional or corporate jobs in addition to being involved in the operations of other institutions

and organizations. This may prove advantageous for the University. However, provisions for handling possible conflicts of interest—real or imagined—must be made.

The nature of such conflicts, potential or real, vary and include nepotism. In the worst-case scenario, the University can suffer significant negative consequences like lawsuits, sponsorship losses, humiliation, and negative public perception. On the other hand, circumstances surrounding potential conflict may be so inconsequential, or present such a small risk, that, on striking a balance, the implications of such conflict are wholly outweighed by the potential benefits to be derived.

13. KUHeS VISION

A world-class university and centre of excellence in health education, research, and innovation.

14. KUHeS MISSION

To advance knowledge, professional competencies, skills, and innovations in health sciences through high-quality student-centred and innovative education and research that responds to and influences global/national Policy, health, and development needs in an efficient, sustainable, and result-oriented manner.

15. AIM

The aim of the University Conflict of Interest Policy is to establish clear guidelines and procedures to identify, disclose, and effectively manage situations in which individuals affiliated with the University have personal or financial interests.

16. OBJECTIVES

The Policy is intended to enable the University to achieve the following objectives:

- a) To regulate actual and potential conflicts of interests that arise in the course of members discharging their contractual and fiduciary obligations to the University;
- b) To manage the adverse impact to the contractual obligations of members and to the reputation of the University arising from any special relationships between staff members and students; staff members and potential candidates for positions, and staff members and vendors and other corporate actors;
- c) To define the consequences of *non-compliance* with the Conflict-of-Interest Policy

17. POLICY PRIORITY AREAS

This Policy outlines four priority areas that cover the majority of issues that arise in situations of conflict of interest.

17.1 Policy Priority Area 1: Potential Conflict of Interest Situations

Policy Issue: Identifying and addressing potential conflict of interest situations is a fundamental aspect of maintaining transparency and integrity within the University.

Policy Statement: The University shall proactively identify and address potential conflict of interest situations to uphold its mission, maintain public trust, and ensure the fair and unbiased operation of its programs and activities.

Strategies

Create awareness among its staff and members on potential areas of conflict which include the following

a. Outside Normal Employment/Paid Activities

- i. An employee undertaking other employment or paid activities may give rise to a potential conflict of interest, particularly when the other work is related to work duties. Depending on the circumstances, an employee's ability to perform their work duties may be adversely affected by the other employment. The university shall require all staff and members to declare their outside paid activities

a. Disposal of Assets

- i. The disposal of University assets has potential conflict of interest implications such as fraud or unofficial use of equipment or collusion.

- ii. University shall ensure that all its employees adhere to the law and University regulations on disposal of assets.

b. Accepting Gifts and Benefits

- i. Gifts are a potential source of conflict of interest. Members shall declare a gift as anything received that has a value of more than the equivalent of USD50.
- ii. The university shall require a member who suspects that acceptance of a gift/benefit could constitute a potential conflict of interest, the member should refuse the offer of the gift/benefit and declare the offer to the Registrar even if the value of the gift/benefit is under the nominated amount listed above.
- iii. The university shall require members to refuse all offers of gifts or benefits from individuals or organisations about which they are likely to make decisions (e.g. tender processes, procurement or licensing or regulation); refuse all offers of money or items easily converted to money, such as shares; and report bribery attempts to the Registrar.

d. Procuring goods and services

- i. In line with legal provisions and other procurement regulations, the University prohibits members from colluding with service providers.
- ii. A potential or perceived conflict of interest may exist when an employee of the University is providing a service to the University or a contractor used at the University is also engaged by an employee for private work. In such situations, a contractor may offer or provide private work at a discounted rate to ensure they remain in good favour for future contracts. This may mean that an employee receives a private benefit which could become a

potential conflict of interest if they are also involved in decisions for the procurement of goods or services for the University. The university shall cause all employees to declare the engagement of the contractor for private work and/or any relationship with the contractor prior to any future awarding of contracts for the procurement of goods or services for the University.

e. Staff Recruitment

- i. A conflict of interest exists in the recruitment of a person with whom an employee has a current or past professional/personal relationship or in whose recruitment they have a vested interest. Where an employee is part of a recruitment panel and becomes aware of such a relationship to a job applicant, the university shall require the employee to declare the conflict of interest to the Registrar. The Registrar will then determine a conflict-of-interest management plan in consultation with the employee. **f.**

Personal or Special Relationships

Conflict of interest may arise in cases where a personal or special relationship exists between a member or another member or a student that may have a bearing on his or her work.

- i. A staff member who has or had a special relationship to, or with, a student with whom he or she has job-related interaction, shall disclose the relationship to the line manager.
- ii. No member of the academic staff may supervise the research of a student with whom he or she has a special relationship.
- iii. A member of staff who has or had any special relationship to, or with, a member of staff or job applicant must disclose the relationship and recuse themselves from any decisions.

- iv. A member of staff who serves in any committee and has any special relationship to, or with, a member of staff or job applicant or student who is the subject of discussion of that committee, shall disclose the relationship to the Chair of the committee and recuse themselves of any further decisions.

g. Research Interests

- i. Researchers, especially Principal Investigators (PIs), have special obligations to make full declarations of any financial interest in general and in particular when involved or intent to be involved in any funded project, and if in doubt must consult the office of the Director, Institute of Postgraduate Studies and Research.
- ii. Investigators must declare any business, commercial or financial activities undertaken for significant financial gain that may raise a conflict or a possible conflict of interest with sponsors or entities affected by the research.
- iii. Prior to KUHeS expenditure of any external research funds, the designated KUHeS official(s) shall, consistent with "Procedures" of this Policy:
- review all disclosures of significant financial interests;
 - determine whether any significant financial interests relate to funded research;
 - determine whether a financial conflict of interest exists; if so,
 - develop and implement a management plan that shall specify the actions that have been, and shall be, taken to manage such financial conflict of interest; and
 - issue reports as appropriate or required to funders.

17.2 Policy Priority Area 2: Declarations of conflict of interest

Policy issue: KUHeS Council members, employees, and students should have a continuing responsibility for identifying, declaring and managing any potential or perceived conflict of interest that applies to them.

Policy statement: The University shall require all members to declare any conflict of interest.

Policy Strategies:

To ensure a smooth declaration of conflict of interest process the following shall be done:

- a. All conflicts of interest must be declared as described in the procedure see section 9 of this Policy document.
- b. At the beginning of every meeting where the matter being discussed includes decisions to appoint a vendor and/or an employee, the chair of that meeting shall require all members to declare interests, with consequences for non-compliance before the meeting proceeds
- c. Council members, employees, and students must declare all interests that (a) pertain to actual or potential service providers to the University (b) may give rise to or may in future give rise to a conflict of interest between them and the University and (c) result in them deriving personal gain from providing services to the University, beyond their employment relationship with the University.
- d. Where Council members, employees, and students suspect that they may have a potential/perceived/actual conflict of interest, they need to discuss any conflict of interest with the Registrar and provide the Registrar with a completed Conflict of Interest Declaration form (Form A). Council members, employees, and students should

provide all information on the reporting form relevant to the identified conflict of interest in order to allow the Registrar to fully assess whether a conflict of interest in fact exists.

- e. Every staff member must declare any special relationships with another staff member or a student that may have a bearing on his or her work.
- f. External Involvements must be performed in accordance with the Research and Consultancy Policy of the University. Any involvement in any external institutional affairs, including moonlighting, must be approved by the line manager or the Executive Dean.

17.3 Policy Priority Area 3: Managing Conflict of Interest

Policy Issue: KUHeS recognises that there shall be potential/perceived/actual conflict of interest.

Policy Statement: The University shall provide procedures for management of conflicts of interest in such a way as to reduce or eliminate the impact of the conflict identified.

Strategies:

- a. Full transparency of relevant disclosure before decisions are made.
- b. Determination of adequate disclosure by the Line Manager. The disclosure made shall be evaluated and may be decided whether the disclosure of conflict is sufficient or whether additional measures will be required to manage the conflict to protect the University / or the member involved.
- c. Management Plan of the conflict of interest. The line manager will prepare and propose a conflict-of-interest management plan. The employee has a responsibility to discuss any proposed conflict of interest management plan with the line manager. The plan may include:

- i. **Record and Disclose:** Ensure all information surrounding the conflict of interest has been disclosed and documented appropriately.
- ii. **Restrict:** Restrictions are placed on the employee's involvement in the matter or the scope of the work is reformulated or there is a restriction on access to certain information.
- iii. **Recruit and Monitor:** A non-conflicted third party is used to oversee part or all of the process that deals with the matter.
- iv. **Remove:** The employee removes themselves, or is removed, from the matter. For example, in a situation in which a job applicant is related to a member of the recruitment panel for that position, a conflict-of-interest management plan might be for that panel member to step down from their position during the selection process for that position only.
- v. **Relinquish:** The employee relinquishes the private interest that is creating the conflict. Where relinquishing the interest is not possible (e.g., relationship with family) and the conflict cannot be managed using one of the other options above, the employee may consider removing themselves from the process.

17.4 Policy Priority Area 4: Sanctions/Consequences for Breaching the Policy

Policy Issue: There is a need for sanctions to be imposed and implemented once there has been an identified breach of the Policy.

Policy Statement: KUHeS acknowledges that conflicts of interest are not in themselves unethical or contrary to this Policy. However, this Policy anticipates that if an employee fails to identify, manage or monitor any

actual or perceived or potential conflict of interest, this may result in disciplinary action or, depending on the seriousness of the circumstances, termination of employment.

Strategies

8.4.1 Listing of Acts and Conduct that will lead to Sanctions

A failure to declare any conflict of interest, or not to do so in a timely and complete manner, and/or failure to adhere to a management plan for a disclosed conflict of interest is subject to discipline in accordance with KUHeS Disciplinary Procedures.

Failure to declare a gift that later turns out to be conflict of interest shall be a breach of this Policy is subject to discipline in accordance with KUHeS Disciplinary Procedures.

8.4.2 Research related sanctions

In the context of research, a failure to declare an interest, and a conflict of interest in the outcome of a particular research.

- a. Where a research funder determines that a research project or clinical research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment has been designed, or reported by an Investigator with a financial conflict of interest that was not managed or reported by the Institution as required by this Policy, KUHeS may, in its sole discretion or as required by grant, contract, law, regulation, or other authority, compel the Investigator involved to disclose the financial conflict of interest in each public presentation of the results of the research and to request an addendum to previously published presentations.

- b. In the event that KUHES identifies a significant financial interest that was not disclosed timely by an investigator or, for whatever reason, was not previously reviewed and/or appropriately managed, KUHES may be required to complete a retrospective review. The review will be to determine whether any funded research, or portion thereof, prior to the identification and management of the financial conflict of interest resulted bias in the design, or reporting of such research. If bias is found, KUHES may be required to promptly notify the research funder or a regulatory body for possible sanctions and, to submit a mitigation report.

18. GUIDING PRINCIPLES FOR IMPLEMENTATION

In the implementation of this Policy, we are guided by the principles of transparency, accountability, fairness, ethics, maintenance of public trust and compliance with existing regulations, policies, and legal instruments. The laid-out procedures were drafted to ensure we operate within these principles.

18.1 Existing Staff

- a. Upon implementation of this Policy, existing members shall fill Form A appendix 1 within 3 months of the start of this Policy
- b. The form will be submitted to the Registrar.
- c. If the situation changes, the employee shall submit a new declaration form within 1 month.
- d. All staff members in grades KU0001 to KU0005 including Procurement Unit, Finance, appointed IPDC members shall declare annually, and all other staff every 3 years.

18.2 New Staff

- a. A new staff member shall complete a Disclosure Form A which shall be submitted with other HR forms on appointment.
- b. The form will be submitted to the Registrar within 3 months of appointment.
- c. If the situation changes the employee shall submit a new declaration form within 1 month.

18.3 Council Members

- a. A Council member and each Council committee member shall make a full disclosure on appointment, and annually before the first Council meeting of each year.
- b. Upon appointment, the Council member and each Council committee member shall complete a disclosure form which shall be submitted to the Registrar.

18.4 Student Leaders

- a. Upon election, all student leaders shall fill the disclosure form A within 1 month of appointment.
- b. The form shall be submitted to the Director of Student Affairs who will then submit it to the Registrar.
- c. If the situation changes the student shall submit a new declaration form within 1 month.

18.5 Declaration of Gifts

Any member who receives a personal gift shall declare the said gift in Form B of Appendix 1.

18.6 Procedure for reporting breach

If anyone observes conduct likely to be in breach of this Policy, they shall report in writing the perceived breach to the Registrar. The Registrar will

then institute normal disciplinary procedures. If the breach involves a member of Council, the Registrar through the VC will report to the Council.

To ensure that conflicts of interest that arise through special relationships are disclosed and that the academic process is not compromised, that fairness in access to resources, opportunities and/or services is not damaged, and that bias, or perceptions of bias are avoided, the line-manager shall take whatever steps are necessary in the management plan of the conflict.

18.7 Annual Reports

Every year the Registrar shall submit to Council issues related to the implementation of this Policy.

19. MONITORING AND EVALUATION

The registrar shall submit to the Council an annual report in relation to implementation and any issues related to this Policy. The report shall include impact assessment, compliance with audits, stakeholder feedback, and case reviews among others. This Policy will be reviewed every five years or as need arises.

20. FINANCIAL IMPLICATIONS

There is a need for awareness of this Policy to members of staff and Council. Therefore, the University will require funding for this activity.

21. APPENDICES

FORM A: DECLARATION OF CONFLICT-OF-INTEREST FORM

I, ... (Name), Staff number: as (Title) set out below, declare my interests in accordance with KUHeS Declaration of Conflict-of-Interest Policy. These interests include any financial or personal interest and other interests held or accruing to me which might give rise to an actual or perceived conflict of interest.

Category	Please give details of the interest
Shares and other financial interests in private or public companies	
Directorships and/or Partnerships	
Remunerated work outside the employee's engagement with the University	
Number of hours on Remunerated work outside the employee's engagement with the University	
Consultancies and retainerships	
Sponsorships	

A special relationship with a student or service provider or member of staff with whom there is a work-related interaction.	
Any other interest	
Nothing to declare (Indicate with an X)	

DECLARATION

I certify that the information outlined above is true and correct and declare, to the best of my knowledge, none of these private or personal interests conflict with any of my official duties of KUHeS. I also undertake to immediately notify my Registrar, in writing if a conflict or potential conflict of interest arises in the future and to not be involved in any decision-making process in which I may be compromised.

I acknowledge that a failure to disclose any relevant information may result in disciplinary action by the University.

..... (Signature) /...../..... (Date)

AUTHORISATION

I have noted the information contained in this Declaration.

.....
(Signature)

...../...../

(Date)

Title:

Please ensure that the **ORIGINAL** form is filed with Human Resources for record keeping purposes by 31 May of a specific year for continuing staff.

FORM B: GIFT DECLARATION FORM

Name	
Department	
Gifts Description	
Value of gift at the time of receipt	
Source of gift	
Date of Declaration	
Officer(s) approving/Not approving the gift(s) to be retained by the recipient.	
Date of Approval/Not approved	