

AHMADU BELLO UNIVERSITY, ZARIA, NIGERIA

**African Center of Excellence for Neglected Tropical Diseases and Forensic Biotechnology
(ACENTDFB)**



**African Center of Excellence for
Neglected Tropical Diseases and
Forensic Biotechnology, ABU, Zaria**

Draft Policy on Financial Conflict of Interest

2021

1. Introduction

Ahmadu Bello University (ABU) is a federal government research-oriented university located in Zaria, Kaduna State. ABU was founded on October 4, 1962, as the University of Northern Nigeria. The university runs a wide variety of undergraduate and graduate programs (and offers associate degrees and vocational and remedial programs). The university has a large medical program with its own A.B.U. Teaching Hospital, one of the largest teaching hospitals in Nigeria and Africa. ABU occupies a particularly important place among Nigerian universities. It is the largest and the most extensive of universities in sub-Saharan Africa. Currently, it covers a land area of 7,000 hectares and encompasses 12 Faculties, a Postgraduate school and over 90 academic Departments. The university It has five institutes, six specialized centers, a Division of Agricultural Colleges, demonstration secondary and primary schools, as well as extension and consultancy services which provide a variety of services to the wider society. The total student enrollment in the university's degree and sub-degree programs is over 40,000, drawn from every state of Nigeria, from Africa and from the rest of world. There are about 1,400 academic and research staff and 5,000 support staff. Owing to the university's leading roles in research and a well-developed research management policy, ABU has won numerous national and international research grants. ABU presently has 12 research centers including the recently established African Center of Excellence for Neglected Tropical Diseases and Forensic Biotechnology (ACENTDFB), which was established in 2014 by funding obtained from the World Bank by the Department of Biochemistry.

ACENTDFB is administratively housed at the Centre for Biotechnology Research and Training (CBRT) while the degree programmes are domiciled in the Department of Biochemistry. The research facilities of the Centre are located in CBRT, Department of Biochemistry, Department of Zoology and the Department of Veterinary Public Health and Preventive Medicine, among others. The postgraduate degree programmes (MSc and PhD Biotechnology and PGD Forensic Biotechnology) were approved at the 463rd Meeting of the Senate of Ahmadu Bello University on 24th April, 2014. The aim of ACENTDFB is to contribute towards the elimination of Africa-endemic tropical diseases through research and manpower development. Africa has continued to be ranked at the bottom of the ladder in terms of development largely because it bears 24% of the global disease burden, with less than 3% of the World's health force and less than 1 % of World's financial resources (Collias et al., 2010). One of such disease burdens is Neglected Tropical Diseases (NTDs), which are a large and diverse group of diseases that disproportionately affect the health and livelihood of the poor in the developing World and typically lack attention and funding for research and development. NTDs are not only a health issue, but they also contribute significantly to worsening poverty levels (decreased food and animal outputs) with attendant social implications. Neglected Tropical Diseases (NTDs) continue to adversely challenge development of Africa due to the persistence of factors that mitigate their control/eradication including lack of sufficient knowledge and database on their distribution and burden; appropriate diagnostic tools; effective therapeutic/prophylactic drugs; treatment failures due to, among other factors, drug resistant strains of pathogens; lack of suitable vaccines and other preventive strategies such as vector control; and safe measures to disrupt the life cycle of the pathogens and their vectors. Another challenge in the region including Nigeria is lack of capacity in forensic science. In line with global standards for research and financial management, ACENTDFB have adapted policies for guidance on financial and ethical conducts.

2. DEFINITIONS

Compensation: means any remuneration, including, salary and payment for services not otherwise identified as salary such as consulting fees, honoraria, and paid authorship.

Covered Persons: the principal investigator and any other individual involved in the design, conduct, or reporting of funded research.

Disclosure: an Investigator's provision of information about their financial interest(s) to ABU.

Equity Interest: any financial interest in the profits of, or stock of, a commercial or non-profit enterprise, a stock option, or any other ownership interest in a commercial or non-profit enterprise.

Entity: any domestic or foreign, public or private, for profit or non-profit legal entity or organization other than ABU, any agency of Kaduna State, or the federal government of Nigeria.

Family Member: an Investigator's spouse, domestic partner or dependent children.

Financial Conflict of Interest (FCOI): a significant financial interest that is related to and could directly and significantly affect the design, conduct, or reporting of the Research.

Financial Interest: anything of economic or monetary value, whether or not the value is readily ascertainable, possessed by an Investigator and his/her family member (see definition above).

Institution of Higher Education: an educational institution in Nigeria, which meets all the following requirements:

- Admits as regular students only persons having a certificate of graduation from a school providing secondary education, or the recognized equivalent of such a certificate, or persons who meet the related requirements of Nigerian law;
- Is legally authorized within Nigeria to provide a program of education beyond secondary education;
- Provides an educational program for which the institution awards a bachelor's degree or provides not less than a two-year program that is acceptable for full credit toward such a degree, or awards a degree that is acceptable for admission to a graduate or professional degree programme
- Is a public or other nonprofit institution; and
- Is accredited by a nationally recognized accrediting agency or commission, or if not so accredited, is an institution that has been granted pre-accreditation status by such an agency or commission.

Institutional Official: one or more persons designated by ABU as having responsibilities and authority under this policy. For the purposes of this policy, this is the Office of Research Compliance.

Institutional Responsibilities: all work performed at or on behalf of ABU, including but not limited to: research conducted at, on behalf of, or through ABU's; research consultation performed on behalf of ABU.

Intellectual Property (IP): defined as ownership and associated right relating to scientific discoveries, technological advances, compilation, and original works. Intellectual Property includes Patents, Trademarks, Copyrights, Trade Secrets and other species such as computer software, Mask Work, printed material, or Tangible Property. The formal protections provided

by Patents, Copyrights or Trademarks may be used to preserve some Intellectual Property from unauthorized use or misappropriation. Intellectual Property is created when something new and valuable has been conceived or developed, or when unusual, unexpected, or non-obvious results have been discovered with existing technology and which can be applied to some useful purpose. Intellectual Property can be created by one person or co-created by several.

Investigator: any employee or faculty member of another institution who is engaged in research at facilities owned, leased or operated by ABU and who is responsible for the design, conduct or reporting of research. Investigators typically include, but are not limited to the following roles, the Principal Investigator or Project Director.

Management Plan: a written plan to address a financial conflict of interest to ensure, to the extent possible, that the design, conduct and reporting of research will be free from bias.

Principal Investigator (PI): any person designated with the title of “Principal Investigator” of a research or sponsored project having primary responsibility for the scientific and technical conduct, reporting, fiscal and programmatic administration, and implementation.

Reimbursed Travel: travel activity for which the travel Expenses are paid directly by the Investigator, who is then reimbursed by an entity for such travel expenses.

Research: a systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g. a published article, book or book chapter) and product development (e.g. a diagnostic test or drug) and includes any activity for which PHS research funding is available.

Significant Financial Interest (SFI): an investigator or family member’s financial interest that reasonably appears to be related to an Investigator’s Institutional Responsibilities and meets one or more of the following criteria, after accounting for any specified exclusions. Note that certain exclusions apply, in which case the interests do not need to be disclosed:

3. GRANTS CONTROL – RECEIPTS & PAYMENTS

3.1 INTRODUCTION

The University receives grants from sources outside the University’s annual grants it receives from federal government. The sources include Government agencies, intervention funds, Industrial organizations, foreign granting agencies, etc. The grants are usually for specific research as well as developmental projects and shall be accounted for based on relevant provisions of IPSAS.

3.1.1 Categories of Grants Receive by the University

Endowment Funds – this category includes endowments, prizes and benefactions designed to fund proficiency and scholarship awards to students and commission professorial chairs. These funds are usually retained by the University in perpetuity while the income generated from the investment of the related funds are employed to satisfy the purposes of the awards.

Research Grants and Benefactions – these comprise of specific research funds and funds set aside for various programmes, either by the University itself or by outsiders. These are recurrent in nature as the life of the grants depends on the completion of the assigned tasks. Research Funds are normally allocated to specific Faculties that are best suited to carry out the tasks involved.

Occasionally, independent research fellows or organizations are co-opted in such research programmes. Programme Funds may cover cultural shows, exhibitions, public enlightenment programmes, human resources development, socio-political surveys and public health services.

Foreign aid - these are grants for specific projects either sponsored individually or jointly under a counterpart funding arrangement.

3.1.2 Grants operation: The operation of each grant is governed by a set of rules and regulations usually pre-defined by the grantor and they often include the keeping of reliable and accurate records of disbursements of the grant money. In exceptional cases, particularly with respect to funds received from foreign organizations, periodic audits and certification by External Auditors are demanded by the grantor.

3.1.3 Responsibility for custody: The responsibility for custody and proper disbursement of all grants is vested in the Bursar who controls the Funds Office that administer the grants. The funds Office under Deputy Bursar (Finance) is expected to maintain its own set of accounts and produce its own Trial Balance which will later be married with Recurrent Funds Trial Balance to produce the financial statements of the University.

3.2 Grants Receipt Procedure

With the implementation of federal government Treasury Single Account (TSA), all grants receivable by the University shall be paid directly into its TSA sub account domiciled at the Central Bank of Nigeria (CBN). All other monies receivable by the University from third parties shall also be paid into the University's TSA. Where in exceptional cases a grantor or donor agency require that a separate account to be maintained for the purpose of managing such grant or fund, a TSA sub account shall be opened at CBN for that purpose. For exceptional cases such as grants obtained by members of existing research centres, the funds will be received into the accounts of the centres domiciled at CBN.

3.3 Grants Disbursement

Payments shall be uploaded directly into the University's TSA sub account after all necessary payment procedure and documentations have been observed. The grant Accountant shall be responsible for processing all payments relating to a grant before passing the payment voucher to cash office for payment. Where necessary, disbursements shall be made in the currency that it was received. Before payment is effected;

- 3.3.1. Research proposals from staff are first considered at faculty level. Each faculty recommends approved research proposals to the University Board of Research for further consideration. The Board notifies the Bursar of an approved research proposal by a copy of the approval letter. The approval letter states the value of the research grant approved.

3.3.2. Research grants are paid out to researchers in tranches. Each application for payment is sent to the Bursar through the office of the Director of Academic Planning of the Vice-Chancellor's Office. This division serves as the Secretariat of the University Board of Research. The beneficiary of an approved request for payment of a research grant will complete an expense advance form before the passing the approved request for payment to the grant Accountant.

3.3.3 Library Development Grants are allocated to the different libraries by the University Librarian in consultation with the Vice-Chancellor. Allocations are communicated to the departments which forms the basis for an expenditure following Due Process. The Bursar shall disburse the funds in accordance with approved payment procedures.

3.4. Clearance of Grant

3.4.1. On a regular monthly basis, the Grants Accountant must review all paid expense advance forms to identify those that are due for clearance as well as long outstanding ones. He must follow up on them and ensure that they are cleared promptly. He must report difficult cases to the Principal Accountant (Expenditure) for necessary action.

3.4.2. There may be a cash balance refundable to the University (affected grant account). In such a case, the refund must be made to the Cashier and official receipt obtained and attached to the Clearance/Claim Form for processing. The following procedures are for the processing of the clearance of an advance against a grant.

3.4.3. The Beneficiary should complete the Clearance/Claim Form and attach all supporting documents such as receipts. Paid invoices and relevant bills in addition to the Duty Travel Allowance (DTA), etc. and obtain the approval of the head of the Beneficiary Department or Programme/Team Leader. Thereafter, the approved clearance/claim form is sent to the Claims and Advances Unit from where it is forwarded in a dispatch book to the University's Internal Auditor for post-payment audit and clearance.

3.4.4. The clearance/claim form and supporting documents now checked, stamped and initialed with date by the Internal Auditor, are passed in a dispatch book to the Grants Accountant for further processing.

3.4.5. Upon receipt of the clearance/claim form and supporting documents now checked and initialed by the Internal Auditor, the Grants Accountant shall:

- (i) examine the documents for completeness, correctness, proper approval and processing;
- (ii) date-stamp the clearance form;

- (iii) obtain the related grant correspondence file;
- (iv) raise in triplicate, the necessary journal to debit affected research project expenses account, credit the research fellow with the total amount on the clearance form and obtain the approval of the Principal Accountant – (Expenditures) for the journal voucher to be processed.

3.5. Compliance with Grantors' Reporting Requirements

3.5.1 To facilitate compliance with grantors' reporting requirements including examination by external auditors of the books of accounts kept for grant monies, the Accountant (Expenditure Control) shall maintain a "Grants Register" which shall provide such details as:

- grant name
- purpose or objective of grant
- project duration
- grantor's name and address
- grant amount
- mode of payment to ABU/receiving accounts
- beneficiary
- reporting requirement
- reporting due date
- external auditors, if any.

The Grant Accountant shall give to the appointed External Auditors adequate notice of his readiness for the commencement of their work and he shall agree a date with them subject to confirmation of the Bursar. On completion of the audit, he shall pass a copy of the audited grant account together with related domestic report to the Deputy Bursar – Finance, through the Principal Accountant – Expenditure, for his information and necessary action. Usually, the auditors would dispatch the audited accounts and report direct to the grantor.

4. Policy

It is the policy of the University that its officers, staff, and others acting on its behalf have the obligation to avoid ethical, legal, financial, or other conflicts of interest, and to ensure that their activities and interests do not conflict with their obligations to the University or its welfare.

This policy incorporates the Seven Principles of Public Life recognised by ABU; the University's officers, staff and others acting on its behalf should abide by those principles.

Accordingly, a Register of Interests is to be kept of the personal interests of staff, both full and part-time, which may overlap with the interests of the University. Thus, members of staff are asked to provide details of membership of external committees whose work may be related to that of the University, as well as their interests as consultants. All members of staff in a position to make or influence decisions (e.g. members of Court and Senior Management Group, Heads of College, Heads of School and Directors of Research Institutes/Centres) and all academic members of staff are required to complete an Annual Return (including a "nil" return) to an appropriate authority (the Head of Departments/Units/Colleges). This acts as an acknowledgement of their knowledge of this policy and a declaration of their specific interests, if any. A small number of

staff in other specified positions may also be required to make an Annual Return. Other members of staff are required to complete an Annual Return to their Head of College and Head of School if they have specific interests to declare. (See Appendix C for details of the process and declaration form.)

In stating this policy, members of staff are reminded that they have a common law obligation of confidentiality and loyalty of service to the University, and must ensure that sensitive and confidential matters relating to the work or administration of the University are not improperly disclosed, either internally or externally. Members of staff are also subject (often on a personal basis) to laws and regulations relating to "insider dealing or trading", or inappropriate provision of market-sensitive information, and should be careful when discussing research or opportunities in this context.

There are situations sufficiently complex that judgements may differ as to whether there is or may be a conflict of interest, and individuals may inadvertently place themselves in situations where conflict exists. Accordingly, anyone with a personal interest that may have the potential for conflict with the interests or welfare of the University should seek advice and guidance from their Head of College or the Secretary of Court: the general principle, "if in doubt, declare it", should be applied. The University has established a Committee on Conflicts of Interest, which is available for consultation in doubtful situations or those of unusual complexity. (See Appendix D for the remit and membership of this Committee.)

Other potential conflicts of interest may arise from opportunities that an individual may have to influence or to be influenced improperly by personal relationships, in ways that are not consistent with the education and employment policies and the principles to which the University is committed. Potential conflicts of interest of a particularly sensitive nature may arise out of sexual relationships, especially in the context of educational or employment supervision and evaluation. Because the effects on other people at work or in the classroom are frequently not apparent to the persons involved in a sexual relationship, anyone with such an involvement should be attentive to the feelings of colleagues and to the potential conflicts of interest that may be involved.

Members of the University community may choose to seek advice on these personal questions from their Head of School, their Head of College, the Human Resources staff, the Secretary of Court, or other counselling resources of the University.

Implementation of this policy is the responsibility of the Secretary of Court, working with the Heads of College. Members of staff who do not comply with the policy may be subject to the University's Disciplinary Procedures, operating in their normal manner.

5. Guidelines

When the University or members of staff interact with external organisations, situations may arise that pose a conflict of interest for members of staff. Normally, this happens when they make decisions while fulfilling their University responsibilities that might materially affect their personal wealth or that of their immediate family members. Sometimes these conflicts can be managed; sometimes they must be avoided. These guidelines are intended as reminders of situations where conflicts may arise and suggestions for how to manage or avoid them. They

are intended to be guidelines for thinking about conflicts rather than rules that cover all possible situations. Generally, prior full disclosure to an appropriate supervisor is the safest policy to follow.

The specific activities that should lead to scrutiny for conflict include:

- Executive and Non-Executive Directorships
- Licensing of Intellectual Property
- Equity Ownership
- Outside Professional Activities and Consultancy
- Research Sponsorship
- Equity Interests
- Human Subjects

5.1. Executive and Non-Executive Directorships

The holding of directorships and other executive and non-executive positions in third party organisations and companies can place a member of staff directly in a position of conflict, and hence should be handled carefully from the outset.

Senior members of staff are not permitted to hold executive positions in companies in which the University has a direct shareholding. Other members of staff require the agreement of their Head of College in consultation with the Research and Enterprise (R&E) Steering Group.

Members of staff may hold non-executive positions in third party organisations and companies, subject to the agreement of their Head of College in consultation with the R&E Steering Group.

Members of staff may hold non-executive directorial positions in University-owned or partially-owned companies, as a representative of the University. In such situations, where the member of staff is in a senior position, they should not be involved in any University decisions relating to that company, as this would put them in conflict with their legal responsibilities as a director.

Members of staff of R&E or other central administrative offices are not permitted to serve in a personal capacity as a director or other officer of a company or commercial enterprise, the establishment of which arose out of or was connected with work done in the University. They are similarly not permitted to serve in a personal capacity as a director or other officer of a company or commercial enterprise in a contractual relationship with the University where the member of staff was concerned or connected with the placing or negotiation of the contract in question.

5.2. Licensing of Intellectual Property

The licensing of intellectual property should lead to the future payment of royalties. The proper distribution of this income depends on correct documentation of the contribution to the invention. Invention Disclosure Documents should be completed and lodged to clarify rights to royalties from licensing. Intellectual property subject to licensing should be accompanied by a disclosure document.

The potential for conflicts is greater for those in managerial or supervisory positions (e.g. supervisors of students, Heads of School, Directors of Research Institutes, Heads of College, and other officers of the University), but conflict of interest situations can arise for anyone. All members of the University community should consult with an appropriate supervisor when it appears there may be a conflict. In some cases, this may not be an immediate supervisor.

Members of staff in Research and Enterprise need to be especially diligent to avoid conflicts of interest. To assure no present or potential future conflict of interest, an individual Research and Enterprise staff member should not personally invest in non-public companies that have licensed University intellectual property. If a member of staff is a partner in a venture fund, that person should not engage in licensing negotiations with any company in which that fund is invested, and those who are voting partners should not recommend University companies to that fund. R&E staff members also have a special responsibility to assure that their knowledge of a University licence to a public company is not disseminated in any way that could affect the company's stock price, and that the knowledge is not used for investment purposes by themselves, their families, friends or business associates.

5.3. Equity ownership

During the time that companies are still privately held, managers and supervisors, including supervisors of students, should not invest personally or own stock in business ventures of their subordinates or students, since there is a conflict of interest between the manager's supervision of the student or subordinate (e.g. assigning grades, approving promotions, determining salary levels, allocating space, etc.) and the manager's business partnership with the student or subordinate.

It is a conflict for an investigator/inventor to negotiate with the University regarding the terms of a licence before the matter of ownership has been definitively resolved. Members of staff who are founding companies should not personally negotiate the licensing terms with the University. A solicitor or a company executive with no connection to the University should be appointed for this task.

Members of staff with equity in or who hold board positions on any company should not be involved in or attempt to influence the University licence or contract terms to that company.

Members of staff of R&E or other central administrative offices are not permitted to hold any shares in a company, the establishment of which arose out of or was connected with work done in the University, nor any company in a contractual relationship with the University, where the member of staff was concerned or connected with the placing or negotiation of the contract in question, unless such shares have been acquired following the listing of the company on a recognised stock exchange.

5.4. Outside Professional Activities and Consultancy

The University believes that its educational program and effective teaching in all its aspects can flourish only when sustained by continuous, active participation of its staff in research, enriched in many cases by interaction with industry, business, government, and other activities and institutions of our society.

This interaction, including outside consulting service to and research for government and industry, is of greatest value when it contributes significantly to the public welfare, offers an opportunity for professional challenge and growth, or otherwise enhances the effectiveness of a member of staff's service to the University.

The implications of such outside professional activity is such that orderly procedures must be followed to avoid ethical and legal conflicts of interest and to ensure that such activities do not conflict with the proper discharge of University responsibilities. Essential elements are a) complete disclosure of outside professional activities, and b) the availability of the best advice and consultation that can be obtained.

Liaison between the Head of College, Head of School and members of staff is the principal means of communication and disclosure in matters involving outside professional activities. The following procedures are to be followed:

- a) It is the obligation of members of staff to keep their Head of College and Head of School informed continually in adequate detail regarding all outside professional activities, service on external committees, and other special assignments, whether within or outside of the University.
- b) It is the further obligation of members of staff to discuss with their Head of College and Head of School the assumption of outside activities that are new in scope or kind, before entering an agreement to undertake them. This is particularly true of those outside activities, such as direct and active management obligations in outside business entities, that normally conflict with the requirement that the primary loyalty of a full-time member of staff be, at all times, to the University, and that are normally incompatible with a member of staffs meeting the full range of his or her obligations to the University.

Situations of unusual complexity or those incapable of satisfactory resolution between members of staff and their Head of College and Head of School may be referred to the Committee on Conflicts of Interest.

Personal responsibility, integrity, and high ethical standards are the principal factors in avoiding conflicts of interest, and the University expects that all members of staff will conduct their outside activities in a manner that reflects credit on themselves, their profession, and the University without need for specific criteria or rules of conduct. The principal safeguards against abuse are the standards required by professional colleagues and the rigorous process by which the University evaluates and selects individuals for appointment and promotion.

5.5. Sponsored Research

University staff accepting research sponsorship from a company in which they have a significant financial interest provides a potential conflict situation. This particularly applies to small and privately-owned companies, and should not prevent a member of staff from receiving research support from a large, publicly-quoted company just because they or a family member owns some shares in the company.

The numbers of staff with a financial interest in an unquoted company may increase as a consequence of the reward mechanisms used by the University (e.g. as part of a package for a member of staff involved in commercialisation of their research through a company). In these circumstances, disclosure of interests and arrangements is particularly important. The resulting project or activity should involve, directly or in an oversight role, a member of staff of suitable seniority who is not connected with the sponsoring company.

Similarly, a member of staff receiving research support would be in conflict if they were in a position to have influence over the sponsor's funding decisions or acceptance of University terms in a licence or contractual agreement.

Other areas in which conflicts could arise are:

- the dissemination of research findings (e.g. their timing and content);
- the use of University resources (e.g. unfunded use of staff or facilities);
- the maintenance of the academic culture (e.g. the rights of students being supervised);
- technology licensing (e.g. undisclosed inventions or negotiation of licensing terms);
- the appropriateness of the sponsored research (e.g. the nature of the business of the sponsor, or the fit with other University, College or School activities).

5.6. Equity Interests

It is becoming more common for the University to receive an equity interest in a company as part of a contract or commercialisation agreement. In such circumstances, it is important that the investment decisions made about that equity interest should be undertaken by a process that is separate from that which makes research decisions.

In the University, investment decisions are undertaken by the Court's Investment Committee, whilst research decisions are undertaken by the Faculties along with the Research and Enterprise Steering Group. GU Holdings Ltd operates on the boundaries of these decisions, and its Board and staff need to be particularly conscious of their positions, decisions and communications.

5.7. Human Subjects

Research involving human subjects, organs or tissue requires especial consideration if there is a potential conflict situation, and thus disclosure of relevant interests is particularly important. This may include disclosure of interests to research participants, as a means of safeguarding individual and institutional integrity.

6. Appendix A: Seven Principles of Public Life

The following principles were set out by the Committee on Standards in Public Life (the "Nolan Committee"):

- Selflessness** Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.
- Integrity** Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.
- Objectivity** In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- Accountability** Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- Openness** Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- Honesty** Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- Leadership** Holders of public office should promote and support these principles by leadership and example.

7. Appendix B: Categorisation and Examples of Possible Conflict Situations

The following classification from the University of Colorado usefully sets out a potential range of conflict situations. Activities and situations that could present conflicts of interest or commitment can be divided into three categories:

- A. Activities that ordinarily are permissible;
- B. Activities that appear to present potential conflicts of interest or commitment;
- C. Activities that clearly present such serious problems as to be incompatible with University policies.

The separation into categories is imperfect and the following list of examples is not exhaustive.

- A. Activities that ordinarily are permissible include:
 - i) Participation in scientific or professional association activities, editorial responsibilities, or service on scientific review boards and panels.
 - ii) Acceptance of honoraria for commissioned papers and occasional lectures.
 - iii) Performance of professionally-related activities such as consulting, textbook authorship, involvement with professional societies, participation on review panels, etc.
 - iv) Service as a consultant to outside organisations, provided the arrangement does not unreasonably restrict publication of research results obtained within the University.
 - v) Service on boards and committees of organisations, public or private, that does not distract unduly from University obligations.
 - vi) Performance of duties that are specified under approved agreements.
- B. Activities that appear to present potential conflicts of interest or commitment:
 - i) Relationships that might enable an employee to influence the University's dealings with an outside organisation in ways leading to personal gain or to improper advantage for anyone. For example, an employee could have a financial interest in an enterprise with which the University does business and be in a position to influence relevant business decisions. Ordinarily such problems may be resolved by full disclosure as well as making appropriate arrangements that clearly exclude that employee from participating in the decisions.
 - ii) Situations in which the time or creative energy an employee devotes to extramural activities, including those listed in A, appears substantial enough to compromise the amount or quality of his or her participation in the instructional, scholarly, and administrative work of the University itself.
 - iii) Activities (research projects, conferences, teaching programs, remunerative consulting agreements, etc.) for which employees are personally remunerated that involve, or might reasonably be perceived to involve, the University, its name, its laboratories, computers or other facilities and equipment.

- iv) Activities that violate or might reasonably be perceived to violate any of the principles governing research supported by funds administered through the University insofar as these principles are relevant to individual behaviour.
- C. Activities that present such serious problems as to be incompatible with University policies:
- i) Situations in which the individual assumes responsibilities for an outside organisation that divert his or her attention from University duties, or create other conflicts of loyalty.
 - ii) Use for personal profit of unpublished information emanating from University research or other confidential University sources, or assisting an outside organisation by giving it unreasonably exclusive access to such information or consulting under arrangements that impose obligations that conflict with University patent policy or with the University's obligations to research sponsors.
 - iii) Circumstances in which research that could and ordinarily would be carried on within the University is conducted elsewhere to the disadvantage of the University and its legitimate interests.

8. Appendix C: Annual Disclosure of Interests Process

It is the duty of all employees to disclose any actual or potential conflict of interest. Failure to disclose an actual conflict may result in disciplinary action. If an individual is unclear whether an interest should be declared or not, he/she should seek the advice of the appropriate Head of College or the Secretary of Court. If in doubt, an interest should be included in the Annual Return. Members of staff in the following positions are required to submit an annual declaration:

- Members of Court
- Members of the Senior Management Group
- Heads of College
- Heads of School
- Directors of Research Institutes
- Convenors of relevant University committees, as defined by the Committee on
- Conflicts of Interest
- Staff in specified posts, as defined by the Committee on Conflicts of Interest
- All academic members of staff

The Annual Return acts as an acknowledgement by the individual of their knowledge of the policy and a declaration of any specific interests. For individuals in the above list, a return is required even if there are no specific interests to declare. Other members of staff are required to make a declaration if they have specific interests to declare.

The Register of Interests of staff in responsible positions (i.e. those required to make an Annual Return as defined above), will be held by the Court Office. Each Head of College will hold a Register of Interests for other members of staff in their Faculty. Academic members of staff should make their return through their Head of School and Head of College, others to the Secretary of Court. These Registers should be available for inspection by members of the University and the wider public by written request to the Secretary of Court or relevant Head of College.

8.1. Information to be Disclosed

Any member of the University who has material interest, either directly or through a business partner, spouse, (unmarried) partner or close relative, in matters likely to be considered by the University should declare that interest. Such declarations should describe the interest clearly and state whether it carries either direct or indirect financial interests.

Relevant interests in this context are:

- All directorships, partnerships, consultancies, trusteeships and other commercial engagements, including non-executive directorships of or employment by, public or private companies likely or possibly seeking to do business with the University.
- Significant shareholdings in public or private companies or ownership or part- ownership of or employment by business or consultancies likely or possibly seeking to do business with

the University.

- Remunerated or honorary positions and other connections with HE institutions which may give rise to a conflict of interest, including relevant external government or public committees, such as Research Councils, charities, Government Departments, professional bodies and training organisations.
- Gifts or offers of gifts, and ex gratia payments.
- Ownership or part ownership or other interest in property in the vicinity to the University.
- Representational or other non-financial interests in areas covering the University (e.g. election as a Councillor or MP for a ward including all or part of the University).

8.2. Disclosure Form

**Ahmadu Bello University
Register of Interests
Annual Return**

Name:
Staff Number:
Faculty/College:
Department:
Rank:

Statement of Policy: It is the policy of the University that its officers, staff, and others acting on its behalf have the obligation to avoid ethical, legal, financial, or other conflicts of interest, and to ensure that their activities and interests do not conflict with their obligations to the University or its welfare.

This policy incorporates the Seven Principles of Public Life established by the Nolan Committee; the University's officers, staff and others acting on its behalf should abide by those principles.

Declaration of Interests:
.....
.....
.....
.....
.....
.....
.....
.....

I acknowledge the University policy on conflicts of interest, and declare the above interests. I confirm that I have no other activities, responsibilities or ownership entitlements that might lead to a conflict of interest situation.

Signature: Date: