



## **Conflict of Interest Policy**

**Health Policy Research Group**

**1<sup>st</sup> Edition, September 2024**

**The University of Nigeria Research Directorate  
2024-2025**

## **Purpose**

The purpose of this policy is to help all staff and Directors at the Health Policy Research Group to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of the Health Policy Research Group, and manage risk.

## **Objective**

Health Policy Research Group aims to ensure that all management and staff are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of the Health Policy Research Group.

## **Scope**

This policy applies to all staff at the Health Policy Research Group, including staff whose main contract may be with other academic units in the University of Nigeria.

## **Definition of Conflict of Interest**

A conflict of interest (CoI) occurs when a person's personal interests conflict or compete, and might impair their ability to make objective or unbiased decisions at work. Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in (Related Parties).

A conflict of interest may be actual, perceived or potential. They can be financial, non-financial, or legal interests:

**Financial:** a Financial Interest is a situation where you or your Related Parties have received in the last 12 months aggregate remuneration, payments, values, bursaries or loans.

**Legal:** a legal interest is a situation where there is a Legal Duty arising, in the last 12 months, or where there are arrangements in place which will arise (formally or informally on the basis of an understanding) in the next 12 months. Duties can arise under legal documents which confer powers upon

you, or your Related Parties, or any other duty that arises by operation of law.

**Perceived:** A perceived interest is an interest to a grant application or project which a reasonable person may perceive to exist, and which relates to the past, present or future relationships with a counter party. These may result in any benefit to the person or Related Parties (other than normal and continuing employment benefits from the employer).

These situations can present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the Health Policy Research Group or partnerships, and need to be tracked, recorded, and transparently and effectively managed.

### **Policy Directions**

It is the policy of the Health Policy Research Group (HPRG), University of Nigeria as well as a responsibility of the management, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to HPRG.

HPRG will manage conflicts of interest by requiring members to:

- a) Avoid conflicts of interest where possible
- b) Identify, disclose and monitor any actual conflicts of interest
- c) Identify, disclose and monitor potential scenarios that are reasonably foreseeable
- d) Establish and maintain an updated record of conflict of interests
- e) Carefully manage any conflicts of interest, and when they do occur, take all steps to mitigate any adverse effect
- f) Follow and communicate this policy to all staff, and respond to any breaches

### **Roles and Responsibilities**

Director of Research/HPRG Coordinator: The Director is responsible for establishing a system for identifying, disclosing and managing conflicts of interest across the research group, as well as monitoring compliance with the policy. The Director is also responsible for communicating the policy to all staff members.

HPRG staff: Staff are responsible to ensure they are aware of the policy and disclose any Conflicts of Interest, by completing the annual declaration and raising any issues as they arise.

### **Dissemination of Policy**

The policy will be shared on the HPRG internet, and communicated with all staff, including any updates made to the policy.

### **Annual Declaration**

An annual declaration will be read and signed by all staff in October of each year. See annex for annual declaration

### **ANNEX – Annual Staff Declaration on Conflict of Interest**

1. HPRG recognises that staff may take on partnerships, trusteeships, public appointments, or other similar roles, outside their University duties. In order to identify any potential conflicts of interest, and in the interests of transparency, please declare all such appointments (both paid or unpaid) for:

A: the last 12 months

B: Planned upcoming appointments

C: Consultancies – please declare the number of days of consultancy you have taken over the last 12 months

2. Please provide detail here any transactions in which you, or your related partners, have had opportunity to influence the sale and / or contracting for services from a third-party organisation

### **Details:**

3. Are you a member of any political or pressure group relevant to the research of HPRG?
4. Please note here anything else which may present an actual, potential or perceived conflict of interest: