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Policy: **Conflict of Interest**

Code: **10LP01**

Reviewed/ Revised: **15/02/2022**

Date of Next Review: **February 2024**

Policy Owner: **Managing Director**

Target audience: **All Employees at EAHM, students**

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**PURPOSE:**

The purpose policy is to define, a conflict of interest is, and to provide guidance on avoiding or addressing such circumstances.

**SCOPE:**

This Policy is principally concerned with interactions between faculty, staff, management, and students. It can, however, also apply to external organizations with whom EAHM has dealing, contacts or collaborations.

**DEFINITIONS:**

**Conflict of interest:** compromise between the personal interests of an employee and his/her institutional roles and responsibilities that may inappropriately influence discharge of such roles and responsibilities.

**POLICY STATEMENT:**

Conflict of interest occurs when:

- Activities of an EAHM staff member outside their employment, leads or could lead to material benefit to the member or his/her immediate family member, either directly or indirectly, to the detriment, or potential detriment, of EAHM.
- The activities of an EAHM staff member interfere, or could interfere, with that member's fulfilment of their employment obligations.

Any reference to a conflict of interest is a reference to an **actual, perceived or potential conflict**.

**Actual conflict** means an existing conflict between roles and responsibilities of an employee and his/her personal interests.

**Perceived conflict** means a reasonable conclusion that roles and responsibilities of an employee and his/her personal interests could inappropriately affect the performance. An employee's personal interests could interfere in discharging his/her roles and responsibilities in future.

In this context, pecuniary gain means any financial interests of an employee outside the working hours which is derived using by virtue of their association with the institution. This may include running a private business, or some other business pursuit wherein an employee having close personal relationship. Examples of when a conflict of interest might occur include, but are not limited to, the following:

- Purchasing items from suppliers and suggesting that due to your links with EAHM a discount should apply, or that additional EAHM business can be secured if favorable terms are given.

- Using influence to ensure that EAHM contracts with or conducts business with an organization or firm that employs you, or a personal friend, or a family member who will directly benefit.
- Purchasing or acquiring items of value from EAHM, subordinates, or students.
- Selling items of value to EAHM, subordinates, or students.
- Having any commercial link with subordinates or students.
- Teaching or assessing students with whom you have a personal, professional, or family link.
- Using influence to ensure that an applicant with whom you have a personal, professional, or family link is given an offer of a place or the award of a scholarship with EAHM.
- Using influence to ensure the appointment or promotion of a person with whom you have a personal, professional, or family link to an employment position with EAHM.
- Using influence to ensure the appointment or promotion of a person who is or has been a student at EAHM to an employment position with EAHM.

**RESPONSIBILITY:**

All employees of EAHM have a duty to declare all conflicts of interest. The Managing Director is responsible for implementing this policy on a day-to-day basis and for monitoring and updating this policy.

**IMPLEMENTATION OF THE POLICY:**

When a conflict of interest arises, the member of staff must immediately make a written declaration to the Managing Director, it should contain the following information:

- The employee's name, position, and the date.
- The name of the organization or individual with whom the potential conflict of interest is occurring.
- An explanation of the relationship that the employee has with the organization or individual.
- A statement regarding the relationship between the organization or individual and EAHM.

This written conflict of interest will be placed in the employee's personnel file, and a copy shall also be attached to any contract or documentation relating to the other organization or individual involved.

Wherever possible, employees who have declared a conflict of interest will be excluded from any further commercial or academic association with the individual or organization. Where this is not possible, the Managing Director will monitor the relationship.

Where the conflict of interest occurs over a commercial activity with a subordinate or a student (e.g. purchasing a car or other item of value) the Managing Director will appoint a third party to review the transaction to ensure that it is fair and that the item is purchased at market value.

A note explaining the transaction and the evidence of its equitability shall be placed on file.

In case an employee does not disclose a conflict of interest (actual or potential), the HOD shall initiate immediate action as soon as any such case comes to his/her knowledge. The penal action in the cases of non-disclosure may range from warning to suspension.

Any case of non-disclosure involving Director/Governors, BoG shall be dealt with by the Chairman-BoG.

EAHM is committed to a fair and ethical educational and business environment. Violation of this policy will result in disciplinary action being taken.

**ASSOCIATED DOCUMENTS:**

- Disciplinary code of conduct and appeals procedures

**MENTIONS:**

Mention of this policy is to be made in the following documents when they are next reviewed.

- Catalogue
- Student Handbook
- Faculty Handbook

**DATE OF NEXT REVIEW:**

This document should be reviewed by **February 2024**.

**POLICY APPROVALS RECORD**

Policy Name: **Conflict of Interest**

Policy Code: **10LP01**

Formerly: EA/ADM/009

Date of first approval: **11/2007**

<b>Reviewed/ Updated</b>	<b>Details of Amendment</b>
09/2008	
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01/08/2018	
01/09/2021	
15/02/2022	- Added definition of Conflict of Interest