



**Policies & Procedures Manual**  
**Sir Syed University of Engineering & Technology**

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<b>Policy Statement</b>
It is the policy of SSUET to establish a quality management system that meets the quality standards expected by our stakeholders. To achieve this, SSUET management is committed to continuous improvement in all areas of activities.

	<b>Name</b>	<b>Designation</b>	<b>Date</b>
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# **CONFLICT OF INTEREST POLICY**

## **1. Preamble**

In a large university where staff hold multiple roles and where external relationships are many and varied, conflicts of interest are bound to arise. In order to manage the associated risks to an acceptable level, all staff, students and others working in the University (including collaborators and academic partners) are required to recognize and disclose activities that might give rise to actual or perceived conflicts of interest. SSUET's Policy on Conflict of Interest is built on the concept of sense of social and moral responsibility and imbued with the Aligarh spirit.

## **2. Introduction**

2.1. A conflict of interest can occur when duties to the University compete with the personal interests of an employee or a student. Actual or perceived conflicts can arise from external activities that are undertaken in addition to University role, personal relationships, or conflicting roles within the collegiate University. They can be financial, non-financial or both.

2.2. If employees and students manage their activities appropriately, they can usually proceed with these as normal whilst at the same time upholding obligations to the University, meeting regulatory and other external requirements and protecting the integrity and reputation of the University and its members.

2.3. By contrast, if they do not, such conflicts – or the perception of conflicts – may jeopardize the University's public standing and may cause serious damage to the reputation of the University and of the individuals concerned. This may also result in litigation or financial loss, and individuals may be subject to disciplinary procedures.

## **3. Policy Statement**

The aim of the Conflict of Interest Policy, and the associated processes and guidance, is to provide employees and students with the information required to be aware of the issues, to be able to recognize potential or real conflicts, and to manage them effectively if they occur.

## **4. Objectives of the Policy**

Objective of the policy is to ensure that:

- Any actual or perceived financial or non-financial conflicts of interest (arising from external activities, personal relationships or roles within the University) are identified and properly managed so that the activity can be carried out without risk to the integrity or the reputation of the University or its staff and students;
- Governance of the University is conducted with close regard to the risks of financial and non-financial conflicts of interest;

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- Procedures are in place for conflicts of interest to be identified and managed in compliance with the relevant professional, legal, ethical and regulatory standards on conflicts of interest;
- Activity is avoided in cases where a conflict of interest cannot be managed; and
- All staff and students are aware of the importance of compliance with the Policy and that compliance with the Policy is monitored.

## **5. Scope**

This Policy applies to all staff and students of the University, to all external Board members and its committees, and all others working in the University (such as faculty members who hold grants but are not current members of staff of the University, retired members who are still conducting research, and teaching or research visitors. A reference in this Policy to staff or students includes any person within the scope of the Policy.

## **6. Responsibilities**

- 6.1 Every student, member of staff and any other person involved in the affairs of the University is responsible for ensuring that they comply at all times with this Policy. Each individual is responsible for recognizing situations in which they have a conflict of interest, or might reasonably be seen by others to have a conflict, to declare that conflict to the appropriate person and to take such further steps as may be appropriate as set out in more detail in this document.
- 6.2 The duty to declare a possible conflict applies to the perception of the situation rather than the actual existence of a conflict. If the situation cannot reasonably be regarded as likely to give rise to a conflict of interest, then there is no duty to declare it. If there is any uncertainty as to whether there is a conflict, or if an individual is uncertain about the application of this Policy or how it might affect their activities, they should contact their respective head of department or reporting officer.
- 6.3 In addition to complying with this Policy, researchers need to be aware of and comply with conflict of interest requirements set by external funders or other bodies with whom agreements have been made. Further information is provided in Appendix A
- 6.4 The Registrar is responsible for ensuring that this Policy is implemented and maintained and that appropriate explanatory guidance is provided.
- 6.5 Heads of department responsible for:
  - ensuring that staff within their departments, faculties or sections (as appropriate), students, and other associated persons are made aware of this Policy and associated explanatory guidance; and

- - keeping records of disclosures and management plans and providing these to the Conflict of Interest Committee on request.

**7. The Conflict of Interest Committee** shall comprise of the following officials:

1. Registrar, Convener
2. All Deans
3. Director QEC
4. Director ORIC
5. Additional Registrar
6. Nominee/s of VC (appointed on case to case basis)

The Committee is responsible for developing and maintaining the Conflict of Interest Policy framework, reviewing reports on compliance, providing support and guidance, escalating risks and issues, and providing recommendations to the University.

## **8. Recognizing Conflict Of Interest**

8.1 There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. Thus it is important for all staff and students when evaluating a potential conflict of interest to consider how it might be perceived by others. Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest.

8.2 In order to recognize actual or perceived conflicts of interest, key interests need to be identified. Within the scope of this Policy, there are three main dimensions to be considered:

### **Dimension 1: roles and relationships**

Actual or potential conflicts generally arise from:

- roles or activities involving parties outside the University;
- roles held by staff and students outside the University;
- multiple roles held by staff and students inside the University;
- committee membership and roles involving decision-making in or on behalf of the University, departments, faculties or other units; and
- close personal relationships.

### **Dimension 2: activities giving rise to potential conflicts**

Actual or potential conflicts generally arise from:

- admissions;
- recruitment;
- examinations
- intellectual property;
- procurement;
- commercial transactions and arrangements;
- conduct and funding of research; and
- external activities and appointments.

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### **Dimension 3: financial conflicts**

‘Financial gain’ or ‘financial interest’ means anything that has monetary value, including but not limited to:

- payments;
- benefits in kind;
- hospitality and/or gifts;
- forgiveness of debt;
- discounts, bonuses or other favorable contract terms.

## **9. Declaring Conflicts of Interest**

9.1 It is the duty of every member of staff, every member of committees/boards or student to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest. The disclosure should be made at the time the conflict first arises, or it is recognized that a conflict might be perceived, in writing to the head of department / reporting officer / supervisor.

9.2 The head of department or the officer who receives the declaration from any individual will forward the declaration to the Conflict of Interest Committee for taking necessary administrative steps, if necessary, and for maintain record.

9.3 Additional steps are required in certain circumstances such as research students receiving support from a company in which their supervisor has a financial interest or where results or IP are related to company activity. These circumstances are governed by SSUET IP / ORIC policies.

## **10. Declaration at Time of Employment**

All persons employed at SSUET, whether permanent or temporary, will be required to fill and submit the “Conflict of Interest Declaration form” at the time of joining SSUET. The form is attached as Annexure “A”. The record will be maintained in their personal files by HR Department. (HR Department will obtain the filled forms from the existing SSUET employees and place it in the personal files)

**ANNEXURE A**  
**CONFLICT of INTEREST DECLARATION**  
**By SSUET Employee**

**I hereby declare that:**

a) My below mentioned close relations are employed at SSUET;

Name: \_\_\_\_\_ Designation: \_\_\_\_\_ SSUET ID: \_\_\_\_\_

b) My following close relations are currently enrolled as students at SSUET.

Name: \_\_\_\_\_ Roll Number: \_\_\_\_\_ Department: \_\_\_\_\_

c) I, hereby, undertake to inform the Registrar through my Chairperson/ HoD if and when the details given above about any close relations is updated.

d) I understand that disciplinary action can be taken against me if I fail to inform/ update the record about my relations at SSUET.

e) **Close relations** include parents, spouse, children, siblings, uncle, aunt, nephews, nieces.

**Signature:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Designation:** \_\_\_\_\_

**Date:** \_\_\_\_\_