



LAHORE GARRISON UNIVERSITY

Main Campus, Sector-C Phase-VI, DHA Lahore
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LGU CONFLICT OF INTEREST (COI) POLICY

(Approved in 21st BASR meeting)



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NOTIFICATION LGU CONFLICT OF INTEREST (COI) POLICY

1. Introduction

This policy addresses conflict of interest (COI) so as to ensure highest standards of ethics and integrity, and to protect Lahore Garrison University interests and reputation, and to prevent its work and protect board members and its employees from potentially damaging instances of impropriety arising from conflict of interest issues. The objective is that members must carry out their work in an environment that is free from any suggestion of improper influence and take all reasonable steps to avoid being in an actual, apparent or potential conflict of interest. The conflict of interest may arise in a situation where financial or other personal or professional considerations compromise an individual's objectivity, professional judgment and ability to perform his or her professional responsibilities to the LGU.

2. Policy Statement

An actual Conflict of Interest arises in a situation where financial or other personal considerations compromise an individual's objectivity, professional judgment, professional integrity, and/or ability to perform his or her responsibilities to the LGU. In addition to situations that clearly give rise to an actual conflict of interest, individuals are cautioned also to consider gray areas that might create the perception of or the potential for a conflict of interest. **Perceived or potential** conflicts of interest can be said to exist in situations where an individual member of the LGU community, a member of the individual's family, or a close personal relation has financial interests, personal relationships, or professional associations with an individual, individuals, or outside LGU, such that his or her activities within the LGU could appear to be biased against the LGU by that interest or relationship. All employees have a legal duty to perform their duties with honesty to the LGU. A breach of this may result into erosion of the trust and confidence in the integrity of the LGU.

3. Scope

This policy applies to all LGU board members, employees including faculty and non-faculty and all those employees associated with the University in contractual obligations. This policy applies to all situations where an employee's personal interests appear to influence the objective exercise of his or her official duties.

4. Defining Conflict of Interest

A conflict of interest is a set of circumstances that creates a risk that professional judgement or actions regarding a primary interest will be unduly influenced by a secondary interest. A conflict of interest (COI) occurs when an individual who is involved in multiple interests has one interest that interferes with another. There is no legal definition of an 'interest' and it should therefore be considered as a broad term which includes any activity or association in which an employee has a personal interest and is in conflict with an individual's ability to properly discharge his/her duties and responsibilities to the best interest of the LGU or otherwise affects its integrity and confidence. It refers to a situation where a conflict arises for an individual between two competing interests and may be termed as perceived, potential or actual conflict of interests. Interests may relate to property, resources, relationships, information or opportunities and are often 'financial' or 'non-financial' in nature, which may mean that an individual or associated person may stand to gain a benefit or suffer a loss, whether directly or indirectly, as a result of holding such interests. Interests which generally would require disclosure include the following:-

- a. Financial interests means anything of monetary value, including, but not limited to payment of services, commission, consultancy fees, equity interests, remittance of debt, property rights (e.g. patents, copyrights and intellectual property rights);
- b. Non-financial interests refer to any non-financial benefit or advantage, including but not limited to direct or indirect enhancement of an individual's career, education or gain to immediate family (or a person with whom the person has a close personal relationship).

5. Recognizing Conflict of Interest

A conflict of interest may arise due to filial relationship or business relationship of employees. In such cases, an individual's private interests compete with his/her professional obligations to an organization, which may result in the exercise of biased

judgment for considerations of personal financial gains. Such situations can have potentially damaging consequences for the integrity and reputation of the organization. Thus conflict of interest can compromise an individual's ability to perform his/her duties and responsibilities objectively.

All decisions and actions taken by members of the community in the conduct of LGU business are to be made in a manner that promotes the best interests of the LGU. The key to recognizing and dealing with conflict of interest is disclosure. Members have an obligation to address both the substance and the appearance of conflict of interest and, if they arise, to disclose any possible conflict of interest to the appropriate LGU authority and withdraw from debate, voting, or other decision making process where a conflict of interest exists or might arise.

6. Board of Governors

Board of Governors has distinct duties in relation to conflicts of interest, including a responsibility for ensuring that LGU procedures are in place for managing conflicts of interest. The role of members of the Board of Governors is akin to the duty of directors in the Companies Act to avoid conflicts of interest. As trustees in a position of 'trust' Board members are prohibited from receiving any benefit directly or indirectly in return for their services or otherwise unless explicitly authorized under the University's authority.

7. University Executive

Members of the University Executive are likely to be at higher risk of exposure to individuals or scenarios in which fraud, bribery or corruption is more likely to occur. The executives are expected to avoid conflicts of interest in all circumstances and should promote transparency and integrity as part of their leadership role.

8. Senior Staff

The Deans, Directors and HoDs are also required to disclose interests. Senior staff also has a leadership role to play in promoting the importance of disclosing interests and support staff accordingly in doing so. Senior staff would be expected to be a first point of contact for staff in their areas of responsibility in helping to assess a particular activity or scenario on the grounds of an actual or potential conflict of interest. They should do this in consultation with colleagues, the HoD or nominee and with reference to this Policy.

9 Disclosure on Conflict of interest

In case of following situations, conflict of interest should be disclosed.

- a. Entering into a business or other contract / transaction on behalf of the LGU with a company or firm in which LGU employee has a financial interest.
- b. Assuming regular service or employment with any other organization in which LGU employee enjoys financial benefits.
- c. Influencing the purchase of equipment, materials or services for the University from a company or firm in which LGU employees have financial interest.
- d. Accepting gifts, benefits or favors from individuals or firms with which the LGU does business, except as token courtesies.
- e. Directing students or staffs of the LGU to carry out work for a company or firm in which LGU employees have a financial interest.
- f. Participating in the appointment, hiring, promotion or evaluation of a related person.
- g. The research supervisors should have no conflict of interest in personal, financial, or professional stakes.

10. Sources of Conflict of Interest in Research

The conflict may compromise an employee's professional judgment in conducting, evaluating, or reporting on research and it may arise from:

- a. Where the research is sponsored by a related body.
- b. Where the researcher or a related body may directly or indirectly benefit from any inappropriate dissemination of research results
- c. Where the researcher or a related body may directly or indirectly benefit from the use of LGU resources.
- d. Where the researcher conducts a clinical trial which is sponsored by any person or organization with a significant interest in the results of the trial.
- e. Where private benefits or significant personal or professional advantage are dependent on research outcomes.

11. Strategies to Address COI in Research

LGU will exercise following strategies for addressing perceived or actual conflicts of interest in the planning / conduct of research and its reporting.

- a. Public disclosure of an investigator's financial interest in any research sponsor or the commercial success of any therapeutic strategy or product that is the subject of any research results being reported.
- b. Monitoring of any research project by independent reviewers.

- c. Modification of any research synopsis / research proposal or plan.
- d. Disqualification of any investigator from participating in all or a portion of any sponsored research.
- e. Divestiture by an Investigator of any financial interest in any research sponsor.
- f. Severance of any relationship between an Investigator and a research sponsor which may create actual or potential conflicts of interest.

12. Procedures on Managing a Conflict of Interest

- a. All employees of the University are considered to be in a position of trust by virtue of their employment with the LGU and therefore have a responsibility to identify and disclose known or potential personal, family, pecuniary or business interests which may interfere, or be perceived to interfere, with an individual's ability to properly discharge his or her duties to the LGU to ensure that such conflicts are seen to be properly managed or avoided. It is the duty of every staff member to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest to the Dean, Director, HoD, Branch Head or the Registrar as the case may be.
- b. All employees' inquiries regarding any aspect of COI policy should be directed to LGU Registrar's Office.
- c. The general rule is that 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 Dean, Director, HoD or Branch Head. If the Dean, Director, HoD or Branch Head has an interest in the matter to be discussed, the disclosure shall be made to the Registrar.
- d. A Member having any interest in any matter to be discussed or decided by the Board or a committee shall, prior to any discussion of the matter, disclose in writing, respectively, to the Board or a committee, as the case may be, the fact of his interest and the nature thereof.
- e. A disclosure of interest shall be recorded in the minutes note for record or other appropriate record keeping documents and member concerned will not take part nor be present in any deliberation or decision making process of the Board or the Committee and shall be disregarded for the purpose of constitution of a quorum of the Board or the Committee.

- f. A staff member who fails to comply may be subject to disciplinary action under the disciplinary policy, depending upon the severity of noncompliance. Failure to comply may be viewed as gross misconduct and the member of staff involved may be subject to disciplinary action.

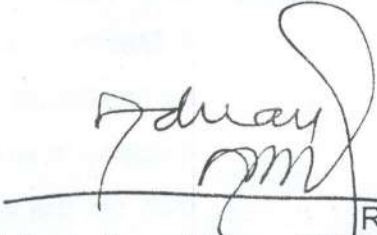
13. Violations of This Policy

Where a conflict of interest was not disclosed by the member before the transaction took place, the issue should be brought to the notice of the management that can take the following routes:-

- a. If the management has a reasonable cause to believe that a person has failed to disclose actual or possible conflicts of interest, it shall inform the person of the basis for such belief and the person may be given an opportunity to explain the alleged failure to disclose.
- b. After hearing the response of the interested person and making further investigation as may be warranted in the circumstances, the management will determine that the person has in fact failed to disclose an actual or possible conflict of interest; it will initiate appropriate disciplinary and corrective action.

14. Disciplinary action will be taken in case of breach of this policy. It is, therefore, the duty of all associated with LGU to ensure that these interests do not create a conflict of interest or a perception of a conflict of interest. Disciplinary action may include, but is not limited to issuance of a warning, financial penalty or termination.

This policy has been approved in 21st BASR meeting held on 12 Jun 2024 and supersedes all previous policies on the subject.


Brig
Registrar
[Adnan Ahmed Khan, SI(M), (Retd)]

All Deans, All Directors, Treasurer, CoE, All Chairpersons & BASR Coordinator