



Conflict of Interest Policy

Year 2023

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Section-1: Definitions

In this Policy Document, unless otherwise specified, or anything repugnant to the Statutes of National University of Modern Languages, the following expressions shall have the meanings as follows:

- 1.1 **Academic staff** - a member of the faculty.
- 1.2 **Administrative staff** - a member of administrative staff.
- 1.3 **Charitable organization** - an organization whose primary objectives are philanthropy and social well-being (e.g. activities serving the public interest or common good).
- 1.4 **Civic organization** - an association of ten or more persons not organized for profit but operated exclusively for educational or charitable purposes as defined herein, including the promotion of community welfare.
- 1.5 **Faculty** - a group of university departments concerned with a major division of knowledge.
- 1.6 **Faculty member** - a member of academic staff.
- 1.7 **Professional organization** - an association that is formed to further the interests of people engaged in a specific profession, to advance a particular profession and serve the public good.
- 1.8 **Proprietary information** - material and information relating to or associated with university's activities, including but not limited to financial information, data or statements, research, marketing plans, client lists, computer programs, processes, and know-how that has been clearly identified and properly marked by the university as proprietary information, or university confidential information. The information must have been developed by the university and is not available to the Government or to the public without restriction from another source.

Section-2: Policy

1 Purpose:

The purpose of this policy document is to recognize and handle both real and potential disputes with transparency. The University management ensures that conflicts of interest are effectively managed to lower legal and reputational risk and proving the integrity of specific staff members as well as the University. This policy was developed to safeguard the (academic and administrative) staff as well as the University administration against any compromise.

2 Scope:

The policy applies to the whole University including its campuses and Rawalpindi Branch.

3 Policy Statement:

NUML employees performing work-related tasks for the University if they have an actual or potential conflict of interest are required to promptly declare the conflict in writing so that the University can decide how to manage or avoid it.

4 Conflict of Interest:

- 4.1 When an employee's outside interest(s) collide with 'those of the university', threaten *those* interests, or prevent them from being fully served, there is a conflict of interest. Another instance of a conflict of interest is when an employee's personal or financial interests interfere with the outcome of a choice that should be made with the university's best interests in mind. The selection or recommendation of suppliers or vendors, the use of university resources, or the utilization of one's own work time are a few examples of decisions that could create conflicts.
- 4.2 Employees must be aware of circumstances that could create or appear to create conflict(s) of interest so that they are always seen as being unbiased, ethical, free from prejudice or undue influence, professional, and fair in carrying out their jobs.
- 4.3 Employees must avoid being in a position to make or participate in a decision as part of their University duties if the decision may directly affect the personal or financial interests of the employee, their family members, or others with whom they have a personal relationship including out of the University.
- 4.4 An employee is not permitted to take part, directly or indirectly, in decisions involving a benefit (such as employment, promotion, pay, work assignments, supervision, other working conditions, or the purchase or use of goods, services, or equipment) for those people or organizations with whom they have a personal relationship, including the following:
 - a. Family members are those who are connected to the employee through blood, marriage, adoption, or other means (including children, grandchildren, parents, siblings, aunts, uncles, cousins, nieces, and nephews, as well as their spouses), as well as those who live in the same household.
 - b. Fellows with whom the employee has a business or professional connection.
 - c. Any business or other entity in which the employee or a family member holds an ownership or any entity for which the employee holds an officer, partner, director, or employee position.
 - d. Any business that desires to work with NUML and with whom the employee has a consulting or other commercial relationship.
- 4.5 The concept of "connection" specified by this policy shall be interpreted broadly in order to avoid a conflict of interest or the perception of a conflict. Employees should disclose the facts

in writing in accordance with this policy and seek advice when determining whether a relationship is covered by this policy.

- 4.6** This policy is intended to offer basic guidance, but whether an actual or seeming conflict exists will typically rely on the specific situation's facts and circumstances. Prior to engaging in any activity, employees should always speak with their supervisor or Director Human Resource if they have any questions about a conflict or possible conflict, or if they are unsure of how their actions may affect others or appear to them.

5 Engagement with External Bodies (/Boards)

Participation in professional, charitable, or civic organizations outside the University or service on external bodies (or boards) could be advantageous to all parties involved: the organization, the community, and the University. To prevent situations where the kind or volume of outside activity might, either directly or by appearance, damage the employee's objectivity or effectiveness in carrying out University duties, an employee must always keep in mind that their primary duty is to the University.

- 5.1** As long as an employee's professional activities (generally related to his/her position at the University) do not unreasonably interfere with his/her ability to perform official duties or conflict with the University's objectives or goals, those activities would not typically cause a conflict of interest. (Professional activities such as participation in conferences, workshops, or symposia as a speaker, organizer, or attendee, or participation in an advisory or visiting committee).

- 5.2** Other extracurricular activities, such as non-partisan public service projects, are typically not part of an employee's job and shouldn't be done during regular working hours or involve the use of University resources, except on rare occasions, unless the University specifically requests it or has given its approval. Employees should take care to avoid claiming to speak for the University, even in connection with the most noble outside activity.

- 5.3** It is required to disclose in writing to *and* consult with one's supervisor any consulting agreements (with or without compensation) or other outside business interests *if* there is a possibility of an actual or prospective conflict of interest.

6 Conflict Disclosure and Resolution: The Process

For the University to properly assess the conflict and choose the best management strategy, an employee with an actual or prospective conflict of interest should promptly, completely, and honestly disclose in writing all pertinent facts and circumstances.

- 6.1** The employee is required to make a prompt written disclosure in the event of an actual or possible conflict of interest (or if facts and circumstances pertaining to the management of a conflict change). The disclosure must be made to the worker's immediate supervisor/Head of Department (HoD), who may also consult the Dean or the Director Human Resource for advice.

- 6.2** The supervisor/HoD with his/her assistant should develop a suitable written plan to manage any conflict (which may include disqualifying an employee from the specific decision). The Director/Dean must be consulted regarding the nature of the conflict as well as the proposed plan, and their written approval is required about handling any conflict.

- 6.3** Any conflicts of interest - actual or hypothetical - that cannot be properly handled there or that the Director/Dean seeks assistance on must be forwarded to the Director Human Resource for suitable resolution. For operations under his/her supervision or control, the Director HR may impose more stringent reporting and disclosure requirements.

7 Exclusive Information

Researchers may have access to sensitive or exclusive (/confidential/proprietary) information when working on consulting or funded research projects. Faculty and staff who come into contact with such information are responsible for making sure it is kept private, and they alone, not the University, are in charge of signing any non-disclosure agreements needed by a sponsor. It is also crucial that confidential business dealings between various organizations that faculty and staff members may deal with are kept confidential.

8 Facilities Usage

Only in exceptional circumstances, and then only with the express written consent of the HoD and Dean or Director Administration, may University equipment or facilities (other than the Library) be utilized for services to other entities, including groups managed by faculty members.

9 Use of University's Name

It is appropriate to state plainly that the University employs a faculty member. However, the National University of Modern Languages (NUML) name may not be used by any person or organization for commercial purposes or as an endorsement of any goods or services. When using the name NUML, the Rector must be consulted in unique cases.

Section-3: Disclosure Form

Conflict of Interest Disclosure

A potential or actual conflict of interest exists, when commitments and duties are likely to be jeopardized by the employee's or board member's significant interests or relationships (especially financial ones), especially if such interests or commitments are not disclosed.

If an employee or board member has a financial stake in an outside organization, their financial interest should be disclosed on the conflict of interest disclosure form. Any personal, family business, or volunteer relationships that could result in a genuine or seeming conflict of interest should also be disclosed by the employee or board member. Financial conflict rules and regulations that have been created by the University and the federal government must be rigorously adhered to.

----- **Disclosure by the Employee** -----

Employee's Name: _____

Division/Department/Branch/Cell: _____

Designation: _____ **Employee id:** _____

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest.

Please specify other nonprofit and for-profit boards you and your spouse sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or your family member own.

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Employee's Signature _____ Date _____

Review by Supervisor/Head of Department (HoD):

Comments:

If a violation of the Conflict of Interest Policy is found, Supervisor/HoD shall develop a Conflict of Interest management plan – and get it approved by the Director/Dean.

Supervisor/HoD's Name: _____

Signature _____ Date _____

Review by Director/Dean:

Comments:

Director/Dean's Name: _____

Signature _____ Date _____

Review by Director Human Resource (HR):

Comments:

Director HR's: _____

Signature _____ Date _____