



**THE UNIVERSITY OF ZAMBIA**

**FINANCIAL CONFLICT OF  
INTEREST IN RESEARCH POLICY  
AND PROCEDURES**

**MAY, 2021**



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## FOREWORD

The development of this Financial Conflict of Interest (FCOI) in research policy demonstrates a strong commitment by the University of Zambia (UNZA) management to support integrity in research and collaboration. The University recognises the importance of relationships between staff and outside institutions, including commercial organisations, and seeks to encourage such relationships where potential exists for significant scientific discoveries and or development of useful products.

The Policy is aimed at strengthening prevention and management of conflict of interest in research by all staff of the university and all research collaborators. The presence of financial conflicts of interest in research poses a problem for professional, patient, and public trust in research and the research enterprise. Hence effective means of identifying and managing conflicts are an important element in successfully achieving the goals of research. Failing to disclose and being involved in conflicts of interest can have severe consequences for workers, investigators and individuals; restriction of access to certain information either on a temporary or permanent basis; removal of authority over certain issues; the involvement of authorities if unlawful acts have been carried out; divestments or liquidation of financial interests that are in conflict, as well as personal reputational damage. Currently, the University of Zambia has no such a policy, leaving room for research misconduct and non-compliance with external funders who require that all collaborating institutions should have a policy to prevent and manage conflict of interest in research.

UNZA management looks forward to the effective implementation of this Policy to achieve an environment free of conflict of interest at the University of Zambia.



.....  
**Prof. Luke E. Mumba**  
**VICE-CHANCELLOR**

**28/05/2021**  
.....

## Acronyms

<b>CDC</b>	:	Centres for Disease Control
<b>CFR</b>	:	Code of Federal regulation
<b>CIRDZ</b>	:	Centre for Infectious Disease Research in Zambia
<b>COI</b>	:	Conflict of Interest
<b>CPD</b>	:	Continuous professional development
<b>FCOIR</b>	:	Financial Conflict of Interest in Research
<b>ICT</b>	:	Information and Communication Technology
<b>PESTLIED</b>	:	Political, Economic, Social (Cultural), Technological, Legal, International, Environmental and Demographic Factors
<b>PFDC</b>	:	Policy Formulation & Development Committee
<b>PPP</b>	:	Public Private Partnership
<b>RND</b>	:	Research and Development
<b>SFI</b>	:	Significant Financial Interest
<b>SNDP</b>	:	Seventh National Development Plan
<b>SWOT</b>	:	Strength, Weaknesses, Opportunities, and Threats
<b>UNFCCC</b>	:	United Nations Framework Convention on Climate Change
<b>UNZA</b>	:	University of Zambia
<b>US</b>	:	United States
<b>USA</b>	:	United States of America
<b>USD</b>	:	United States Dollar

## Definition

In this Financial Conflict of Interest in Research Policy, unless the context otherwise requires, the following words or phrases mean as stated below:

<b>Clinical Trial:</b>	Any research that involves interaction with human subjects and the concurrent investigative use of drugs, biologics, devices or medical or other clinical procedures, such as surgery.
<b>Conflict of Interest Committee (COI) Committee):</b>	The Committee or individual designated by the University to advise the Director of Research and graduate studies on conflict-of-interest matters. Such a committee will be appointed by the Vice-Chancellor for a duration of two years, renewable.
<b>Family:</b>	Any member of the Investigator’s (researcher’s) immediate family, specifically, any dependent children, spouse and other close family relations.
<b>Financial Interest:</b>	Anything of monetary value received or held by an investigator or an investigator’s family member, whether or not the value is readily ascertainable, including, but not limited to: salary or other payments for services (e.g., consulting fees, honoraria, or paid authorships for other than scholarly works); any equity interests (e.g., stock options, or other ownership interests); and intellectual property rights and interests (e.g., patents, trademarks, service marks, and copyrights), upon receipt of royalties or other income related to such intellectual property rights and interests.
<b>Significant Financial Interest:</b>	A financial interest that reasonably appears to be related to the Investigator’s Institutional Responsibilities
<b>Financial Conflict of Interest:</b>	A significant financial interest (or, where the director of research and graduate studies or conflict of interest committee requires disclosure of other financial interests, a financial interest) that UNZA reasonably determines could directly and significantly affect the design, conduct or reporting of institutional research.
<b>Director of Research and graduate studies:</b>	The individual within UNZA that is responsible for the solicitation and review of disclosures of significant financial interests including those of the investigator’s family related to the investigator’s institutional responsibilities. For the purposes of this policy, the Director of Research and graduate studies is designate as the Deputy Vice-Chancellor.
<b>Institutional Responsibilities:</b>	The Investigator’s responsibilities associated with his or her Institutional appointment or position, such as research, teaching, clinical activities, administration, and institutional, internal and external professional committee service.
<b>Investigator (Researcher)</b>	Any individual who is responsible for the design, conduct, or reporting of sponsored research, or proposals for such funding. This definition is not limited to those titled or budgeted as principal investigator or co-investigator on a particular proposal, and may include postdoctoral associates, senior scientists, or graduate students. The definition may also include collaborators or consultants as appropriate.

<b>Research:</b>	A systematic investigation, study, or experiment designed to contribute to generalisable knowledge relating broadly to public health, including behavioural, social-sciences research and any type of research. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug).
<b>Prime Awardee:</b>	The organisation, individual, or other entity that receives a financial assistance award (i.e., is the signatory on the award), is financially accountable for the use of any of the funds or property provided for the performance of the project, and is legally responsible for carrying out the terms and conditions of the award. The prime recipient is responsible for oversight of all funding including giving sub-awards to collaborators.
<b>Sub Awardee:</b>	The entity that is sub contracted to do a part of the research or work required by the funder and reports directly to the prime awardee.
<b>Ethics Committee:</b>	Any ethics regulatory body responsible for maintaining ethical standards in research



## 1.0. INTRODUCTION

The University of Zambia recognises the importance of relationships between staff and outside institutions, including commercial organisations, and seeks to encourage such relationships where potential exists for significant scientific discoveries and or development of useful products. However, the financial incentives that often accompany such relationships may lead to financial conflicts of interest. They also have the potential to create real or apparent bias in research, affecting research integrity and potentially placing human research subjects at an additional risk. Conflicts of interest, both real and perceived, threaten public confidence in the research enterprise as a whole.

## 2.0 SITUATION ANALYSIS

Research institutions are now required by several funders and partners to develop policies that address financial conflict of interest policies that would include training, prevention and management of conflict of interest when they occur. This promotes integrity and public confidence in such research institutions. In terms of human subject protection, FCOI policies ensure that specific financial interests in research do not affect the rights and welfare of human subjects. The University of Zambia has several funders who are supporting research and other activities, and these partners expect the University to have a policy which address FCOI. As it stands currently, The University of Zambia has no financial conflict of interest in research policy, hence risking loss of funding opportunities and loss of public confidence in the research conducted by UNZA investigators.

### 2.1 Overview of the Situation Analysis

The development of the University of Zambia Financial Conflict of Interest Policy (FCOI Policy) is a commitment by the institution to responding to financial conflict of interest in research situations and to translate into action lessons learnt during the past years when the financial conflict of interest policy (FCOI Policy) was not in existence.

Research, being one of the cost centres with significant capital investment, is prone to misuse in the absence of written rules and regulations to guide its utilisation as well as the conflict of interest that may arise during the conduct of research. This policy shall help in the prudent utilisation of the institutional research resources and serve as a guide for all those conducting research. A well outlined policy on relevant processes, procedures and research parameters will, therefore, be the main management tool for educating and enforcing financial conflict in research at the University of Zambia.

### 2.2. The Internal Environment

The internal environment of the University was analysed based on the following categories:

- (i) (a) strategy (b) structure (c) staff and skills (d) financing and financial management programmes (e) research facilities and infrastructure (f) ICT software programmes, These six inter-related factors determine the internal dynamics of an institution.
- (ii) The critical research areas of the University.

#### (a) Strategy

The institution has not been operating with a formal financial conflict of interest in research policy (FCOIR Policy) *but was being guided by University financial guidelines, Staff Disciplinary and Grievance Procedure Code and the University of Zambia Research Policy and Intellectual Property Rights Policy, and generally researchers own rules of do's and don'ts that provided it with the current research framework.*

**(b) Structure**

The University of Zambia has a semi-autonomous governance of research programmes. Where strategic research policy coordination are at the Directorate of Research Office, the day to day research is administered by the various schools, directorates, units and departments. Hence the need to enact a holistic Financial Conflict of Interest Policy in Research (FCOIR Policy) for the entire university based on the instruments mentioned herein under the legal framework.

**(c) Staff and Skills**

The core research resource of the University lies in its diversity of highly qualified and skilled administrative and technical staff. Currently, the University has approximately of over 3,500 both academic and non- academic staff against a total population of over 24, 000 staff and students. Additionally, there is need for the University to increase its budgetary provision towards Continuous Professional Development (CPD) programmes.

**(d) Financing and Financial Management Programmes**

- (i) Ideally, the main source of funding for research facilities and research should be UNZA. However, in the recent years actual funding has been dwindling and the university has not been able to fund research as it would like to. This obviously poses a heavy challenge to sustain the research for the University Research logistics.
- (ii) The University has another category of donor funded research that are partially or fully funded in terms of research costs by foreign funding agencies.

**(e) Research Facilities and Infrastructure**

The research facilities and infrastructure of UNZA include research laboratories, equipment and garages. UNZA has research facilities and infrastructure all across its schools and units, even though they are not adequate. The following are the key research infrastructural related challenges:

- (i) *Poor research facilities – which affects reliability, safety and quality of service to support a good learning environment for all;*
- (ii) *Inadequate research and equipment due to insufficient funding;*
- (iii) *Inadequate research in all subject areas.*

**(f) ICT software infrastructure**

The university has the basic ICT infrastructure to meet the dictates of modern research management programmes. However, there is need to improve the ICT infrastructure so that it can support high performance computing to support research.

**(g) The critical research areas of the University**

The research areas for UNZA are in all areas. The main controlling centre is the Great East Road Campus.

**2.3. The External Environment**

In addition to examining the internal environment, the development of the Financial Conflict of Interest In Research Policy (FCOIR Policy) also took into account external factors that may have a bearing on the research capabilities of the University. The external environment was analysed by looking at the major Political, Economic, Social (cultural), Technological, Legal, International, Environmental and Demographic factors (PESTLIED). This analysis is provided below.

**(a) Political Factors**

The University of Zambia is a semi-autonomous public institution operating under the *Higher Education Act* No. 4 of 2013 of the laws of Zambia. However, being partly a government funded entity means that the institution is heavily guided by government rules and regulations as may be directed by the government from time to time.

It goes without saying that the university research and infrastructure is greatly dependant on government funding and budgets. This implies that the University has to take into account the provisions of the national framework and the SNDP in its development of the financial Conflict of Interest Policy (FCOIR Policy).

**(b) Economic Factors**

The variables in the national macroeconomic management has impacted negatively on the performance of the University of Zambia, in terms of research and funding of research and equipment. Purchase of equipment is heavily influenced by fluctuations in inflation and exchange rates. This means that our research costs have been on the rise due to these fundamental macro-economic factors. In a nut shell, our research costs have been raising thus affecting the institutional budget lines. To mitigate this, both the institution and the government need to supplement the University budget. This can be achieved by increasing the government grant allocations to UNZA. Additionally, the University can seek other means of generating income to sustain its research as well as cultivate linkages with foreign funding agencies.

**(c) Social and Cultural Factors**

There has not been any significant effects on our research programmes resulting from the social-cultural factors. However, this cannot be underestimated as extreme dissatisfactions can affect the morale of research staff or even lead to student unrest if the quality of research services is neglected.

**(d) Technological Factors**

In many countries, modern research and logistics management programmes have technologically advanced. These changes and advancements can be exploited to improve performance and drastically reduce research costs. When used appropriately, technology can enhance effectiveness and efficiency in the research programmes, funding of research and related equipment. In the case of the University of Zambia, advancements in technology have led to massive cost reduction and improvements in the quality of outputs. Some of these developments and investments in technology which have benefited the University community include:

- (a) Computers and other mobile based devices;
- (b) Internet; and
- (c) Social media.

**(e) Legislation Factors**

As explained in the legal frame work later, the University of Zambia is subject to all relevant legal legislative statutes relating to research in the country.

**(f) International factors**

The University of Zambia has a number of international collaborations with other international stakeholders and international universities. However, there are exceptions in some instances of donor funded projects that come with specific memorandums of understanding arrangements, for specific periods of time, which are not fully under our institutional Financial Conflict of Interest Policy (FCOI Policy).

**(g) Environmental Factors**

The growing desire to protect the environment, is having an impact on many industrial sectors including Research and Development (RND). There is a general move towards more environmentally friendly products and processes which affect demand patterns on one hand and creating business opportunities on the other hand. Our institution does not have robust programmes on environmentally accepted ways of handling materials, when it comes to storage and disposal. Methods of approved disposal for some of the aforementioned materials are expensive to our institution.

**(h) Demographic Factors**

The population of UNZA is increasing and there is a growing demand for research logistics. This is manifested by the number of grade twelve school leavers being higher than the available university places. However, the staffing levels have not matched the student population, thereby exerting a strain on the staff because they are the same staff that are involved in research.

**2.4. Analysis of Strengths, Weaknesses, Opportunities and Threats**

In addition to analysing the internal and external factors, that have a bearing on research at the University of Zambia, a further analysis of the significant internal Strengths, Weaknesses, Opportunities and Threats (SWOT) to the University was also undertaken in order to gain a detailed understanding of the prevailing situation. A summary of the SWOT analysis is presented in the table below.

**Table 1 Financial conflict of interest policy (FCOI Policy) SWOT analysis**

Strengths (S)	Opportunities (O)
<ol style="list-style-type: none"> <li>1. High capacity profile of skilled in-house human resource staff</li> <li>2. Has building infrastructure with potential to handle research</li> <li>3. Enjoys international recognition as the oldest public university leading University among the public Universities in Zambia.</li> <li>4. Potential to develop and run new modern based all types of research</li> <li>5. Availability of land for future expansion and development of research infrastructure.</li> <li>6. Existence of consultancy and expertise reservoir related to research and other fields</li> </ol>	<ol style="list-style-type: none"> <li>1. Availability of a great number of trained and skilled academic and non-academic personnel willing to work for UNZA.</li> <li>2. The liberalised economy creates opportunities to venture into commercial research services.</li> <li>3. Existence of new technology in research</li> <li>4. Research challenges provide opportunities for research and development (RND).</li> <li>5. A pool of national and international partnerships and collaborations.</li> <li>6. Good will from funding agencies to support UNZA Research expansion programmes</li> <li>7. High potential for PPP in Research infrastructure development</li> </ol>
Weaknesses (W)	Threats (T)
<ol style="list-style-type: none"> <li>1. Inadequate financial capacity for research</li> <li>2. Lack of technology in implementing research management tools.</li> <li>3. Limited resource mobilisation of new skilled personnel.</li> <li>4. Poor liquidity - affecting timely research operational funding.</li> <li>5. Demoralised research staff due to inadequate funding and delayed salaries.</li> <li>6. Inadequate research capacity among some research personnel</li> </ol>	<ol style="list-style-type: none"> <li>1. Multiplicity of private universities implies that UNZA may lose its status as a University of quality research.</li> <li>2. Increasing competition from industry for skilled research staff because of widening gap in staff remuneration.</li> <li>3. International competition from other universities in and outside of the region.</li> <li>4. Declining government funding</li> <li>5. Volatile and unstable economy</li> <li>6. Uncompetitive salary structures</li> </ol>

### 3.0 VISION

To be an Institution where financial conflict of interest in research is effectively managed.

### 4.0 POLICY STATEMENT

The University shall ensure that staff adhere to cohesive guidelines governing the Financial conflict of interest in research policy to enhance transparency and integrity by researchers.

### 5.0 GOAL

The purpose of this policy is to promote objectivity in research by establishing guidelines for reporting and resolving financial conflicts of interest for research.

### 6.0 OBJECTIVES

The objectives of this policy are as follows:

- (a) Promote financial integrity in research at the University of Zambia;
- (b) Promote public disclosure of significant financial interests in research;
- (c) Manage financial conflict of interest in research; and
- (d) Provide training in financial conflict of interest in research.

## **7.0 SCOPE**

This policy governing financial conflict of interest in research applies to all investigators and individuals conducting research at the University of Zambia, through the support and funding from the University of Zambia, Zambian Government, foreign countries or organisations.

The University of Zambia Compliance Officer (‘Director of Research and Graduate Studies’) is responsible for ensuring implementation and may suspend all relevant activities until the financial conflict of interest is resolved or other action deemed appropriate by the Director of Research and graduate studies is implemented. Violation of any part of this policy may also constitute cause for disciplinary or other administrative action pursuant to rules and regulations of the institution.

This policy implements the requirements of funders (foreign countries, bilateral organisations, multilateral organisations, non-governmental organisations and any other funding organisations).

## **8.0 POLICY DIRECTIONS AND STRATEGIES**

### **8.1 Disclosure of Financial Interests**

#### **8.1.1 Policy Direction**

All investigators and individuals’ involved and conducting research are required to disclose their outside financial interests to UNZA annually and additional disclosures, as described below. The Director of Research and Graduate Studies is responsible for the distribution, receipt, processing, review, retention of disclosure forms and any other obligations regarding disclosure of financial interests.

#### **8.1.2 Policy Strategy**

There shall be a disclosure of significant financial interest to the University through the Director of Research and Graduate Studies on an annual basis or and as required through the necessary obligations of each individual.

### **8.2. Review and Decision of the Director of Research and Graduate Studies**

#### **8.2.1 Policy Direction**

All financial disclosures shall be reviewed and decided upon by the Director of Research and Graduate Studies working through the Conflict of Interest Committee (COI).

#### **8.2.2 Policy Strategy**

There shall be a review of all disclosures by the Director of Research and Graduate Studies working through the Conflict of Interest Committee

### **8.3 Clinical Trials**

#### **8.3.1 Policy Direction**

All significant financial interests related to clinical trials shall be reviewed by the Director of Research and Graduate Studies working through the conflict of interest committee.

#### **8.3.2 Policy Strategy**

Clinical trials involve particularly sensitive issues, if the investigator or other individuals involved have a Financial Interest related to the clinical trial. Any FCOIs related to clinical trials will be reviewed by the COI committee to determine under what circumstances the research may be conducted when a financial conflict of interest exists.

## **8.4 Reporting to Funders**

### **8.4.1 Policy Direction**

All conflict of interest or non-compliance shall be reported to the supervisor and funders; and dealt with using relevant policy regulations in the university.

### **8.4.2 Policy Strategy**

There shall be reporting of conflict of interest of non-compliance to supervisors and funders.

## **8.5 Investigator Non-Compliance to the Policy**

### **8.5.1 Policy Direction**

Non-compliance with the provisions of this policy shall be dealt with using existing university regulations.

### **8.5.2. Policy Strategies**

#### **(a) Determination of Action**

Relevant action shall be taken to address non-compliance with this policy.

#### **(b) Regular Reviews**

There shall be regular reviews of the Financial Conflict of Interest in Research.

## **8.6 Training**

### **8.6.1 Policy Direction**

All Investigators and individuals involved in research shall undergo and complete training in financial conflict of interest in research.

### **8.6.2. Policy Strategy**

There shall be training of investigators and individuals involved in research on financial conflict of interest in research.

## **8.7 Record Retention**

### **8.7.1 Policy Direction**

All disclosure forms, conflict management plans, and related documents shall be retained and preserved for a period of five years.

### **8.7.2 Policy Strategy**

The Office of the Director of Research and Graduate Studies shall retain all disclosure forms, conflict management plans, and related documents for a period of five years from the date the final expenditure report is submitted to the Funder or to the Prime Awardee or any other relevant funding authorities.

## **8.8 Confidentiality**

### **8.8.1 Policy Direction**

To the extent permitted by law, all disclosure forms, conflict management plans, and related information shall be confidential and shall be guided by existing policy guidelines and regulations within the university.

### **8.8.2 Policy Strategy**

There shall be confidentiality in managing all disclosure forms, conflict management plans, and related information.

## **8.9 Public Accessibility**

### **8.9.1 Policy Direction**

All requests for information, related to any aspect of research being conducted by the University of Zambia, shall be responded to promptly.

### **8.9.2 Policy Strategy**

Prior to the expenditures of funds, UNZA shall respond to any written request within five business days of the request being received at by the institution by mail (print or electronic), information concerning any significant financial interest that meets the UNZA Financial guidelines. The response will be guided by UNZA communications Policy and or any other existing government regulations.

## **9.0 INSTITUTIONAL FRAMEWORK**

In implementing the FCOIR Policy for the University, the Directorate of Research and Graduate Studies shall have an overall responsibility of ensuring that the policy is adhered to. However, specific office holders shall also have responsibility to perform their duties in the process of its implementation as existing in the institution.

- (a) University Procedures and Regulations, Staff Disciplinary and Grievance Procedure Code and the University of Zambia Research Policy and Intellectual Property Rights Policy.
- (b) All Staff conducting research shall be governed by the UNZA Financial Guidelines.
- (c) All Staff conducting research shall be governed by the Code of Conduct and Ethics of their professions.

## **10.0 LEGAL FRAMEWORK**

This policy shall be applied with reference to other existing legislation such as:

- (a) The *Higher Education Act* governing higher education in Zambia and other Laws governing research in Zambia, such as the *Health Research Act* [No. 2 of 2013] of the Laws of Zambia.
- (b) The *Public Finance Management Act* No. 1 of 2018.

## **11.0 MONITORING, EVALUATION AND REVIEW OF THE POLICY**

The implementation of this Policy shall be closely monitored to ensure that it is properly institutionalised across the University in line with its objectives. The University of Zambia Compliance Officer (“Director of Research and Graduate Studies”) shall be responsible for the coordination of monitoring and evaluation activities of this policy.

The Policy shall undergo review every 3 years. The evaluation shall focus on progress made in the implementation of the policy and assessment of the appropriateness of the overall policy.

## **12.0 POLICY DEVELOPMENT PROCEDURE**

The implementation of this Policy shall be closely monitored to ensure that it is properly institutionalised across the University line with its objectives. The University of Zambia Compliance Officer (‘Director of Research and Graduate Studies’) shall be responsible for the coordination of monitoring and evaluation activities of this policy.

The Policy shall undergo review every three years. The evaluation shall focus on progress made in the implementation of the policy and assessment of the appropriateness of the overall policy.



## 13.0 PROCEDURES AND GUIDELINES

These procedures shall apply for the purposes of adhering to guidelines governing the FCOIR of the University of Zambia as follows:

### 13.1 Financial Interest does NOT include:

- 13.1.1 Salary, royalties, or other remuneration from UNZA;
- 13.1.2 Income from seminars, lectures, or teaching engagements sponsored by or from advisory committees or review panels for Zambian or federal, state or local government agencies of foreign countries or organisations; Zambian or foreign institutions of higher education; foreign research institutes affiliated with institutions of higher education, Zambian or foreign countries' academic teaching hospitals and medical centres, or
- 13.1.3 Equity interests or income from investment vehicles, such as mutual funds and retirement accounts, so long as the Investigator does not directly control the investment decisions made in these vehicles.
- 13.1.4 For Investigators, *Financial Interest* also includes any reimbursed or sponsored travel undertaken by the Investigator and related to his/her institutional responsibilities. This includes travel that is paid on behalf of the Investigator rather than reimbursed, even if the exact monetary value is not readily available. It excludes travel reimbursed or sponsored by UNZA, federal, state or local government agencies of foreign countries or independent foreign organisation, Zambian or Foreign institutions of higher education, research institutes affiliated with institutions of higher education, academic teaching hospitals, and medical centres.

### 13.2. Disclosure of Financial Interest

#### 13.2.1 Annual Disclosures

All Investigators must disclose their significant financial interests to UNZA, through the Institutional Office, on an annual basis. All forms shall be submitted to the Office of the Director of Research and Graduate Studies or designee by 1st March for the previous calendar year. Significant financial interest” may mean the following financial interests related to the institutional responsibilities of an Investigator or Innovator, and:

- (a) If with a publicly traded or non-publicly traded entity, the aggregate value of any salary or other payments for services received during the twelve month period preceding the disclosure exceeds \$5,000 (USD) or Zambian kwacha equivalent; or
- (b) If with a publicly traded entity, is an equity interest during the twelve month period preceding or as of the date of disclosure exceeds \$5,000 (USD) or Zambian kwacha equivalent; or
- (c) If with a non-publicly traded company, is an equity interest of any value during the twelve month period preceding or as of the date of disclosure; or
- (d) Is income related to intellectual property rights and interests not reimbursed specifically through UNZA.

### **13.2.2 Ad hoc Disclosures**

- (a) In addition to annual disclosure, certain situations require ad hoc disclosure. All Investigators must disclose their significant financial interests to UNZA, through the Institutional Official, within thirty days of their initial appointment or employment.
- (b) Prior to applications for sponsored projects or entering into sponsored projects, where the Investigator has a significant financial interest, the investigator must submit to the Director of Research and Graduate Studies an ad hoc updated disclosure of his or her significant financial interests with the UNZA outside entity. UNZA will not submit a research proposal unless the Investigator(s) have submitted such ad hoc disclosures.
- (c) In addition, all Investigators must submit to the Director of Research and Graduate Studies an ad hoc disclosure of any Significant Financial Interest they acquire during the course of the year within thirty days of discovering or acquiring the significant financial interest.

## **13.2 Travel Disclosures**

13.2.3 Investigators must also disclose reimbursed or sponsored travel related to their institutional responsibilities, as defined above in the definition of Financial Interest. Such disclosures must include, at a minimum, the purpose of the trip, the identity of the sponsor or organiser, the destination, and the duration.

13.2.4 The Director of Research and Graduate Studies shall determine if additional information is needed (e.g., the monetary value) to determine whether the travel is significant financial interest and could possibly constitute a financial conflict or interest with the investigator's research.

## **13.4 Review and Decision of the Director of Research and Graduate Studies**

If the disclosure form indicates a Significant Financial Interest (SFI), it shall be reviewed promptly by the Director of Research and Graduate Studies or designee for a determination of whether it is related to the investigator's institutional duties and if the SFI constitutes a Financial Conflict of Interest. If a financial conflict of interest exists, the Director of Research and graduate studies shall take action to eliminate, reduce, or manage the conflict, as appropriate. In addition the following shall apply:

13.4.1 A Financial Conflict of Interest shall exist when the Director of Research and Graduate Studies or designee determines that a Significant Financial Interest is related to the Investigator's Institutional duties and could directly and significantly affect the design, conduct, or reporting of research or other funder supported research. If the Director of Research and Graduate Studies determines that there is a Financial Conflict of Interest that can be managed, he or she must require and approve a written management plan before any related research goes forward. The Director of Research and Graduate Studies is responsible for developing and submitting a proposal management plan.

13.4.2 To address complex situations, oversight committees may be established by the Director of Research and Graduate Studies to periodically review the ongoing activity, to monitor the conduct of the activity (including use of students and postdoctoral appointees), to ensure open and timely dissemination of the research results, and to otherwise oversee compliance with the management plan.

### **13.5 Reporting to Supervisor and Funders**

- 13.5.1 Should any reported conflict or non-compliance require reporting to the supervisor and funders, the Director of Research and Graduate Studies shall report in accordance with the funder's regulations.
- 13.5.2 If the funding for the Research is made available from a prime awardee, such reporting shall be made available to the prime awardee such that they may fulfil their reporting obligations to the PHS or other funder.
- 13.5.3 Disciplinary action under the relevant laws, policies and regulations

### **13.6 Investigator non-compliance to the policy**

- 13.6.1 In the event of an Investigator's failure to comply with this policy, the Director of Research and Graduate Studies may suspend all relevant activities or take other disciplinary action until the matter is resolved or other action deemed appropriate by the Director of Research and Graduate Studies is implemented.
- 13.6.2 The Director of Research and Graduate Studies' decision to impose sanctions on an Investigator because of failure to comply with this Policy, or failure to comply with the decision of the Director of Research and Graduate Studies, shall be described in a written explanation of the decision to the Investigator, COI Committee and, where applicable, the Ethic Committee and will notify the individual of the right to appeal the decision. The Director of Research and Graduate Studies shall also notify the funder or the prime awardee relating to the research, specifying the actions that will be taken to manage the financial conflict of interest.

### **13.7 Regular Review**

- 13.7.1 In addition, if the Director of Research and Graduate Studies determines that a financial conflict of interest was not identified or managed in a timely manner, including but not limited to an investigator's failure to disclose a significant financial interest that is determined to be a financial conflict of interest, or failure by an investigator to materially comply with a management plan for a financial conflict of interest, a committee appointed by the Director of Research and Graduate Studies shall complete an adhoc review of the Investigator's activities and the research project to determine whether the research conducted during the period of non-compliance was biased in the design, conduct or reporting of the research.
- 13.7.2 Documentation of the review shall include the project number, project title, PI, name of investigator with the financial conflict of interest, name of the entity with which the investigator has the financial conflict of interest, reason(s) for the review, detailed methodology used for the review, and findings and conclusions of the review.
- 13.7.3 The Director of Research and Graduate Studies shall update any previously submitted report to the funder or the prime awardee relating to the research, specifying the actions that shall be taken to manage the financial conflict of interest going forward. If bias is found, the report shall include a mitigation report in accordance with the funder's regulations, including a description of the impact of the bias on the research project and the plan of action to eliminate or mitigate the effect of the bias.

### **13.8 Training**

- 13.8.1 Each Investigator must complete training on this Policy, their disclosure responsibilities at least once a year.

- 13.8.2 They must also complete training within a reasonable period of time as determined by the Director of Research and Graduate Studies in the event that this Policy is substantively amended in a manner that affects the requirements of investigators, or within thirty days if the Investigator is new to UNZA or if it is determined that the investigator has not complied with this policy or with a management plan related to their activities.
- 13.8.3 The Institution shall provide the training.
- 13.8.4 A certificate of having done the training must be produced.

### **13.9 Confidentiality**

- 13.9.1 UNZA may make such information available to an agency funding research of the Investigator, to a requestor of information concerning financial conflict of interest related to PHS funding or to the primary entity who made the funding available to UNZA, if requested or required.
- 13.9.2 If UNZA is requested to provide disclosure forms, conflict management plans, and related information to an outside entity, the Investigator shall be informed of this disclosure.
- 13.9.3 Any authorised disclosure shall be dealt with under the UNZA Staff Disciplinary and Grievance Procedure Code.

### **13.10 Public accessibility**

A determination has been made that the Significant Financial Interest is a Financial Conflict of Interest. The information to be made available shall be consistent with the requirements of the Communications Policy of the University of Zambia.

## 14.0. APPENDIX – Conflict of Interest Declaration Form

*Please read the UNZA Conflict of Interest Policy. If you believe that you may be involved in a conflict-of-interest situation or if you are unsure and seek to disclose a potential or perceived conflict of interest please reach out to the designated official at UNZA.*

### SECTION 1: PERSONAL DETAILS

NAME:

JOB TITLE / AREA OF RESPONSIBILITY:

PHONE:

EMAIL:

DATE:

### SECTION 2: DISCLOSURE DETAILS

I hereby disclose that I, or my family members, (tick yes or no for each question)

1. Receive any remuneration from a commercial entity or other organization with an interest related to the work conducted by UNZA, either from employment or consulting services including services as a technical or other advisor.  Yes  No
2. Are a part of any review committees or scientific boards which may have influence or solicit or receive applications from or commission work to UNZA.  Yes  No
3. Hold any position or appointment, or any business or professional relationships (whether commercial or non-financial) with other bodies related to climate science, such as the UNFCCC or others.  Yes  No
4. Hold any position or appointment, or any business or professional relationships (whether commercial or non-financial) with any a current UNZA funders  Yes  No
5. Have material personal business transactions with any current UNZA funder  Yes  No
6. Hold or have held any position or appointment, as a government employee of any country (please disclose country in section 3) in the last 5-years.  Yes  No
7. Have a business relationship (including joint ownership of a company) with any Government Official who would be in a position to influence the acquisition of the Company's services or otherwise provide a commercial advantage to the Company?  Yes  No
8. Have volunteer or other commitments that may pose a conflict of interest  Yes  No

### SECTION 3: CERTIFICATIONS

*I hereby certify that: (tick yes or no for each question)*

1. I have not been found by a court or government agency of any country to have violated a law prohibiting fraud, bribery, money laundering, or other corruption?  Yes  No
2. I have never been found by a court or government agency of any country to have violated any criminal or securities law and/or have ever been under investigation or subject to a suit (now or within the last five (5) years) alleging fraud, bribery or other corruption  Yes  No

*If you marked 'Yes' for any items selected above, please complete the following information for each item. If additional disclosure details are required, please copy and paste the section in the document or append a written document to your submission.*

## SECTION 4: DISCLOSURE DETAILS

### DISCLOSURE RELATES TO QUESTION # ABOVE:

The actual, potential or perceived conflict of interest relates to: *(tick all appropriate box/s)*

- |  |  |
|--|--|
| <input type="checkbox"/> Myself  | <input type="checkbox"/> My spouse   |
| <input type="checkbox"/> Other direct family members (parents, siblings, children) | <input type="checkbox"/> Other direct family members (parents, siblings, children) |

The following actual, potential or perceived conflict of interest has been identified. (please insert all relevant details)

The (actual, potential, or perceived) conflict is expected to last: *(tick appropriate box)*

- |                                      |  |
|--------------------------------------|--|
| <input type="checkbox"/> 0–12 months | <input type="checkbox"/> >12 months or ongoing |
|--------------------------------------|--|

## SECTION 5: DISCLOSURE DETAILS

- |  |  |
|--|--|
| <input type="checkbox"/> Myself  | <input type="checkbox"/> My spouse   |
| <input type="checkbox"/> Other direct family members (parents, siblings, children) | <input type="checkbox"/> Other direct family members (parents, siblings, children) |

The following actual, potential, or perceived conflict of interest has been identified. (please insert all relevant details)

The (actual, potential, or perceived) conflict is expected to last: *(tick appropriate box)*

- |                                      |  |
|--------------------------------------|--|
| <input type="checkbox"/> 0–12 months | <input type="checkbox"/> >12 months or ongoing |
|--------------------------------------|--|

## SECTION 6: EMPLOYEE'S DECLARATION

To the best of my knowledge and belief any actual, perceived or potential conflicts between my duties as a(n)  employee  board member and my private and/or business interests have been fully disclosed in this form in accordance with the requirements of the UNZA Conflict of Interest Policy. I hereby certify that the information set forth above is true and complete to the best of my knowledge.

I acknowledge, and agree to comply with, any approach identified in this form for removing or managing an actual, perceived or potential conflict of interest.

SIGNATURE:

DATE:

## SECTION 7: TO BE COMPLETED BY THE UNZA RISK AND COMPLIANCE OFFICE

In my opinion the details provided:(tick appropriate box)

- |  |
|--|
| <input type="checkbox"/> do not constitute a conflict of interest, and I authorise the employee to continue the activity (go to Section 4).  |
| <input type="checkbox"/> do constitute an actual, potential or perceived conflict of interest (please provide a detailed action plan below). |

If the situation does constitute a conflict of interest, please ensure that the following actions have been considered:

- ensure all information surrounding the conflict has been disclosed and documented
- inform likely affected persons of the conflict, seeking their views where relevant as to whether they object
- reformulate the scope of work or restricting access to certain information
- recruit a third party to oversee part or all of the process
- recommend to relinquish the interest that is causing the conflict
- temporarily remove the person from the process or responsibilities
- monitor the person's activities closely in relation to the conflict of interest
- take no further action because the conflict is minimal.

I have reviewed the above considerations and request that the Employee takes the following action to eliminate/manage the conflict:

I will ensure this action plan is reviewed:		
<input type="checkbox"/> Within 1 month	<input type="checkbox"/> Within 3 months	<input type="checkbox"/> Within 6 months
<input type="checkbox"/> Within 12 months	<input type="checkbox"/> Other – specify	<input type="checkbox"/> N/A: the conflict is one-off or short duration

**SECTION 8: PRINCIPAL / EMPLOYER**

The actions described in the approach outlined in Section 3 have been put in place to effectively manage any actual, potential or perceived conflict of interest disclosed in Section 2. The approach outlined in Section 3 ensures that the UNZAs public interests and reputation is adequately protected.

NAME: \_\_\_\_\_ DATE: \_\_\_\_\_