



EAGLE VISION INT'L BUS. SCHOOLS

Head Office: No. 7Ikorodu Road Maryland, Lagos, Nigeria

Branch:White House Bus stop, Orofun Town, Eleko - LFZ Coastal Express, Lagos

EVIBS Conflict of Interest Policy/Commitment

Definition of what is considered a Conflict of Interest

A conflict of interest occurs when an EVIBS representative/employee's personal interests conflicts with their responsibility to act in the best interests of the Centre.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the College/ATHE qualifications and must be managed accordingly.

This Strategy Document enables us to identify when conflicts occur and put suitable tools in place to ensure we are able to mitigate these through regular meetings and declaration forms handed to staff and lists of the most important areas where one could occur.

It is compulsory for all employees and representatives to comply with the conflicts of interest policy:

Evibs Management must ensure that:

- All staff members are aware of the definition of the term 'Conflict of Interest' and they are aware of their responsibilities and how to identify a situation that could be perceived as a conflict of interest
- There is a designated person/unit (quality Assurance) that will manage and review conflicts of interest within the centre and that the contact details of this person are detailed below
- Any conflict of interest which has arisen is reported to ATHE within two months consideration that an investigation may have to take place and you will need to ensure that the centre has learnt from it and a new process or policy may need to be incorporated to ensure this does not happen again in the future



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Objective:

To ensure staff members act in the interest of the School:

- A. Not bringing personal or financial interests to the organisation
- B. To provide a mechanism that allows for interest to be declared so as maintaining appropriate accountability.
- C. To protect EVIBS/ATHE Interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of EVIBS Or might result in a possible excess benefit transaction.
- D. To ensure school learning material and confidential information is not made available to unauthorized parties
- E. To ensure student/partners information are kept confidential at all times by all employees of the organisation
- F. To protect the organisations intellectual property and copyrights.

General Principles

- Conflict of interest is defined as a circumstance where the duties and responsibilities of an employee member towards the School overlap with their private interests. This results in a situation where the employee member may be tempted to make decisions for reasons other than the best interests of the School
- **There are three specific types of conflict of interest:**
 1. **Actual conflict** – a real conflict exists between the employee's private interests and the interests of the School



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2. **Potential conflict** – a member’s private interests do not currently conflict with those of the School, but could potentially conflict in the future
 3. **Perceived conflict** – a third party could reasonably believe a conflict exists
 4. For the remainder of this policy document these three categories of conflict will all be considered equivalent. No special treatment will be accorded one type of conflict above another
- **Private interests can be divided into two categories:**
5. **Pecuniary interests** exist where there is financial gain or loss involved, even if money does not specifically change hands. This would include an ongoing financial relationship such as being a paid employee of the School or leasing property to the School
 6. **Non-pecuniary** interests exist when no financial component exists but an interest exists due to relationships, social or cultural ties or involvement in an outside organization
- **Examples of areas of Conflict**
7. Assessors understand that they should not mark the work of immediate colleagues, friends or relatives.
 8. A lecturer invigilating their own students during examinations should not be tempted to help students during the examination or award high scores, which would go against their obligations as an invigilator

Treatment for identified Conflict of Interest



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When a conflict is identified at EVIBS, the following alternative actions should be taken to address the conflict depending on the severity of the conflict.

9. **Register** – The employee officially informs the school of the existence of a conflict in writing or in a meeting where minutes are taken.
10. **Restrict** – The employee is restricted in their participation in the discussion or decision making process pertaining to a particular subject where a conflict exists
11. **Recruit** – A disinterested third party is appointed to oversee part or all of a process where a conflict exists
12. **Remove** – The employee does not participate in any way in a matter where a conflict exists. This would include excusing them self from a meeting where the matter is under discussion
13. **Relinquish** –The private interest creating the conflict is relinquished by the employee, thus eliminating the conflict
14. **Resign** – The employee resigns from the school

Specific Guidelines

- The overriding responsibility of employees is to put the interests of the School above all other interests. The employee will exercise this responsibility by putting aside, in management deliberations and decisions, any other interest they may hold, whether it be as a member of another organization or as an individual
- Where the employees are members of a group served by the School they will not act in any way to advance their individual interest but the general interests of those served by the School, including the corporate organisations, parents and students. *Example:* An employee is the parent/guardian of a student. The parent



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employee must make a decision based on the general needs of the School and all children, rather than whether an individual child is likely to benefit from the decision or not.

- Where an employee have a pecuniary interest in a matter they will declare their interest and remove themselves from the matter in question

Example: a facilitators or tutor's company is tendering a corporate training contract for the school, the independent tutor would not take part in discussions or decisions about awarding the contract.

- If an employee identifies, or is alerted to, a conflict of interest for themselves, or another employee, they are obligated to register the conflict with the school at a meeting and have the conflict recorded in the minutes of the meeting
- If an employee registers a non-pecuniary interest the school management may then decide, after assessment or the risk whether the member should remove themselves from the matter, restrict themselves in some way or take no action at all, depending on the severity of the conflict
- If an employee has a clear ongoing pecuniary interest (as opposed to a short term interest in a specific matter) they must seek to resolve the resulting conflict at the earliest appropriate opportunity. In this context resolving the conflict must involve relinquishing the interest or resigning their position.

Violations of the Conflicts of Interest Policy

- a. If the school management has reasonable cause to believe a staff member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.



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- b. If, after hearing the staff member's response and after making further investigation as warranted by the circumstances, the management determines the staff member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Conflict of interest Commitment

Each employee both on full time/part time basis with EVIBS delegated responsibilities shall annually read, sign and submitted a statement which affirms such person:

- a. Has received a copy of the conflicts of interest policy.
- b. Has read and understands the policy.
- c. Has agreed to comply with the policy.

See conflict of interest Form Below



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EVIBS Conflict of Interest Disclosure Form

Name in full: _____

Position (Employee/Facilitator/ IT): _____

Reports to: _____

Date: _____

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between EVIBS and your personal interests, financial or otherwise:

_____ I have no conflict of interest to report

_____ I have the following conflict of interest to report (please specify other businesses you (and your spouse) or an immediate family member are an officer or



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director, or a majority shareholder, and the name of your employer and any businesses you or a family member own or are involved in):

1. _____

Give Details of your involvements:

2. _____

Give Details of your involvements:

3. _____

Give Details of your involvements:

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of Eagle Vision Int'l Business School ltd. (EVIBS).

Signature:

Date: _____



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