



Conflict of Interest Policy UB-PO-HR-003/0

1. Background and Purpose

The University of Belize is dedicated to upholding high levels of integrity, honesty, transparency, and accountability in all aspects of its operations and activities. The establishment of this policy is aimed at ensuring that the Board of Trustees members, all employees, and other representatives of the University adhere to ethical standards and prevent any conflicts between personal interests, whether direct or indirect, and the best interests of the University.

The purpose of this policy is to provide guidelines for recognizing situations where personal interests may conflict, or reasonably be perceived to conflict, with one's duties at the University. It seeks to identify the different types of conflicts of interest that require disclosure to the University of Belize, following proper procedures for declaring and disclosing such conflicts.

2. Scope/Users

This policy applies to all stakeholders of the University of Belize, including:

- University Board of Trustees members
- All employees
- Students
- Visiting research or teaching faculty
- Coordinators
- External members of the University, such as working groups and advisory committees, consultants of equivalent bodies
- Contractors and consultants engaged by the University's representatives
- Volunteers
- Interns
- Honorary appointees
- Any related party

Conflict of Interest Policy

Note: The inclusion of students is limited to situations where the student(s) hold positions that could create conflicts of interest (e.g., student workers, research assistants, or student government representatives).

3. Definitions/Terms

Conflict of Interest	A conflict of interest exists when the commitment or duties owed by an employee or a stakeholder to the University is likely to influence with, or may possibly conflict with, a personal, financial or any other interest or inside/ outside activity that the employee holds and/or by the interests of someone who has a close personal connection to the employee. It arises whenever an interest could reasonably be perceived as affecting, or having the capacity to affect, an individual's ability to make impartial decisions on the University's behalf.
Disclosure	The action of an employee or a stakeholder declaring or disclosing information that shows or potentially shows that improper conduct has occurred, is occurring, or is likely to occur.
Employees	An "Employee" of the University of Belize is a person whom the University hires to perform a service for a wage or salary, in accordance with the Labour Laws of Belize and in accordance with the Mission and Vision of the University.
Stakeholders	Refer to the University's Board of Trustees members, all employees, students, visiting research or teaching faculty, coordinators, volunteers, interns, honorary appointees, and external members of the University, such as working groups and advisory committees, consultants, or equivalent bodies, as well as any other related party.
Types of Conflicts of Interest	Refers to the different types of conflicts of interest that may affect the University of Belize employees and their stakeholders. The different conflicts of interest are listed below: <ul style="list-style-type: none">• Actual Conflict of Interest: A definite and evident clash between an individual's personal, professional, or financial interests and their obligations to the University.

Conflict of Interest Policy

- **Financial Conflict of Interest:** Refers to a situation where there is a potential for an individual to personally benefit financially. It could involve a financial gain for someone who has a close personal relationship with an employee, or where it is reasonable for others to believe that financial benefits might influence the person's actions.

Examples of such financial benefits include: payments, non-monetary perks, gifts, hospitality, or intellectual property rights.

- **Non-Financial Conflict of Interest:** Encompasses any benefit or advantage, either direct or indirect, that can contribute to the advancement (or enhancement) of an individual's career or education, or that can be seen as advantageous to an individual with a connection to them.

- **Personal Conflict of Interest:** Occurs when an individual's personal interests or obligations may interfere with their ability to make impartial decisions or act in the best interest of others. It arises when there is a potential clash between an individual's personal interests and their professional or fiduciary responsibilities.

- **Perceived Conflict of Interest:** A situation in which an individual's actions or

Conflict of Interest Policy

decisions could reasonably be perceived as being influenced by personal interests, even if there is no actual conflict of interest or improper conduct. A perceived conflict of interest can arise when there is a potential for bias or when the circumstances create doubts about an individual's ability to act impartially. It is based on the perception or appearance of a conflict rather than an actual conflict of interest.

- **Potential Conflict of Interest:** Exists where the interests of an individual are not currently in conflict, but there is a reasonable likelihood that they may give rise to a conflict in the future.

4. Policy Statement

The University of Belize employees and their stakeholders are expected to exercise sound judgment, demonstrate professional dedication, and uphold ethical principles, thereby ensuring that their personal, professional, or financial interests do not undermine their capacity to act in the University's best interests.

4.1. Core Obligations

All University of Belize employees and their stakeholders must:

- a) Exercise sound judgment and maintain ethical standards;
- b) Prioritize University interests over personal interests;
- c) Avoid creating conflicts between personal and University interests;
- d) Disclose all actual, potential, or perceived conflicts promptly;
- e) Comply with established management strategies for identified conflicts.

4.2. Disclosure Requirements

Using the official Conflict of Interest Disclosure Form, University of Belize employees and their stakeholders must disclose conflicts:

Conflict of Interest Policy

- a) At the time of hiring/appointment;
- b) As soon as new conflicts arise;
- c) Annually for ongoing situations;
- d) When circumstances change;
- e) External employment that may create an actual, potential, or perceived conflict of interest with University responsibilities requires prior disclosure and approval. This includes, but is not limited to, employment with organizations that conduct business with the University, compete with University programs, could influence University decisions, or may compromise the individual's ability to fulfill their University obligations.

4.3. Working Hours and Commitments

- a) Standard University work week is 39.5 hours unless contracted otherwise.
- b) External commitments must not interfere with University duties.
- c) External employment requires prior disclosure and approval.
- d) Activities must align with the University's mission, values, reputation, or strategic objectives.

4.4. Prohibited Activities

University of Belize employees and their stakeholders must not:

- a) Use University resources for personal gain;
- b) Exploit University connections for personal benefit;
- c) Misuse of confidential information;
- d) Accept inappropriate gifts or benefits;
- e) Make decisions where conflicts exist without disclosure and approval.

4.5. Management of Conflicts

The Corporate Management Team (CMT) will:

- a) Review all disclosed conflicts;
- b) Determine appropriate management strategies;
- c) Document decisions and rationale;
- d) Monitor compliance with management plans;
- e) Report regularly to the Board of Trustees;

4.6. Enforcement

- a) Violations will result in disciplinary action.
- b) Appeals may be made to the Board of Trustees.
- c) Retaliation against good-faith disclosures is prohibited.



Conflict of Interest Policy

d) Confidentiality will be maintained to the extent possible.

4.7. Implementation Responsibility

The Office of Human Resources serves as the primary owner and administrator of this policy. In this capacity, it is responsible for overseeing the comprehensive implementation of the policy across all University operations, providing authoritative interpretation and guidance on policy matters, maintaining all relevant documentation and records, and coordinating effectively with the Corporate Management Team (CMT) for conflict resolution and management. The office ensures consistent application of the policy and serves as the central point of contact for all conflict-of-interest-related matters.

5. Relevant Legislation

Public Service Regulations (2001) Section 19

Constitution of Belize Chapter 4 (2021) Section 121

6. Key Related Documents

University of Belize's Faculty and Staff Handbook

University of Belize's Ethics and Responsibility Policy (2011)

7. Policy Approval and Review

This policy will be approved by the Board of Trustees and will generally be subjected to a five-year review. The Office of Human Resources may, from time to time, recommend policy amendments to the Board of Trustees via the Office of the President.

8. Amendment History

Revision #	Description of changes	Reason(s) for the change	Date of revisions
0	Initial release	Not applicable	Same as Initial Release