



Cordelia Foundation
for the Rehabilitation of Torture Victims

Conflict of Interest Policy

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1 Principles

- 1.1 All staff member shall at all times exercise good faith in all matters relating to their duties and responsibilities to the Cordelia Foundation, act in the best interest of the Cordelia Foundation when discharging their duties and comply with the Cordelia Foundation's Code of Ethics.
- 1.2 No staff member shall use their position or confidential information obtained in the course of employment to their personal advantage or for any other purpose not specifically approved by the Cordelia Foundation, or be influenced in the discharge of their duties by any personal, financial or other interest, involvement or relationship they may have.
- 1.3 Each employee is responsible for recognizing a potential conflict-of-interest and for disclosing it pursuant to the procedures described below.
- 1.4 The purpose of this policy is to ensure that all conflicts of interest are declared, declared conflicts are managed to mitigate the associated risks and that decisions and actions are documented to ensure transparency and accountability.
- 1.5 The existence or discovery of a conflict of interest does not constitute a breach of policy as long as it is disclosed as soon as possible.
- 1.6 This policy should be read and applied in conjunction with the Cordelia Foundation's Anti-fraud and Bribery policy.

2 Definitions

- 2.1 A conflict of interest exists or may exist whenever an employee or his/her family member has any involvement, interest or relationship, directly or indirectly, in a proposed transaction with the Cordelia Foundation from which the employee or his/her family member receives, or may be perceived as receiving, a financial or other personal benefit. Employees are required to report each such transaction with a family member, regardless of whether preceding transactions with the same family member have been reviewed and approved.
- 2.2 A "family member" is defined as a spouse or domestic partner, children and their spouses, parents, siblings and their spouses, grandparents, grandchildren and their spouses, aunt, uncle, first cousin, niece, nephew, corresponding in-law, and respective "step" relations.

3 Examples of Conflicts of Interest Requiring Disclosure

Some examples of conflict requiring disclosures are included below. This list is not intended to be exhaustive.

- Relationships between any person and their line manager
- Relationships between the Cordelia Foundation staff or board members and suppliers, donors, grantees, beneficiaries or job applicants.
- A 'relationship' in this context could include family, romantic relationships, being a bank signatory, advisor or board member.
- A Family Member of a Cordelia Foundation employee applies for an employment position at a Cordelia Foundation.
- A Family Member of a Cordelia Foundation employee is considered for a consultancy with the Cordelia Foundation.
- A Cordelia Foundation employee or Family Member of a Cordelia Foundation employee has an ownership interest in, is employed by, or sits on the board of directors of a company that provides goods or services to the Cordelia Foundation.
- A Cordelia Foundation employee engages in consulting activities or enters into an employment relationship with an entity whose activities are in conflict with the activities or mission of the Cordelia Foundation. (Note: Any such activity also requires prior approval of the supervisor and Medical Director, see Outside Employment below)

4 Disclosing Conflicts of Interest

- 4.1 All Cordelia Foundation board members and staff members with roles in finance (accounting), procurement and HR are required to complete and sign annual conflicts of interest disclosure forms (Appendix 1). These forms are provided at the start of each year.
- 4.2 In addition to these annual disclosures, if a proposed transaction arises in which an employee has, or believes s/he may have, a conflict of interest, the employee is required to make an immediate disclosure to the Medical Director and his/her immediate supervisor, using the conflicts of interest disclosure form (Appendix 2). This disclosure must be done prior to any consideration or execution of the proposed transaction by Cordelia Foundation.

5 Process for Resolving Conflicts of Interest

- 5.1 The employee shall not participate in the deliberations on the matter but shall disclose any material facts related to the proposed transaction.
- 5.2 Upon a determination by the Medical Director that a conflict of interest exists, the Medical Director may request that appropriate actions be taken to resolve the matter.
- 5.3 Appropriate actions should be taken to resolve the conflict of interest, which may be temporary or permanent, for example:
 - A procurement committee member being removed from a particular supplier selection decision in which they are conflicted.
 - A staff member ceasing to act as board member, signatory or advisor which is causing the conflict
 - A conflicted staff member is removed from all aspects of the recruitment and selection process
 - One person in a romantic relationship within the Cordelia Foundation leaves.
- 5.4 The steps taken to manage the conflict of interest and mitigate the risk of conflicted decision taking should be documented on the declaration form.

6 Outside Employment

- 6.1 Employees may not engage in any outside consulting or employment that conflicts with the interests of the Cordelia Foundation. Employees are required to fulfil the responsibilities of their position, and any external employment activity that results in neglect of the employee's job responsibilities is inappropriate. Employees should obtain written approval from their supervisor and the division head to engage in any outside consulting activity or employment.

Appendix 1 – Annual Conflict of Interest Declaration Form

Annual conflict of interest declaration form

This form should be completed before 15 January each year by all board members and staff members with roles in finance (accounting), procurement and HR.

Your name:

Your position:

I understand that a conflict of interest arises if an employee or a Board Member has an interest, relationship, or friendship which could, or could be seen to, interfere with their ability to decide an issue in the best interests of the Cordelia Foundation.

I understand that the existence of a conflict of interest does not constitute a breach of policy, so long as it is declared, so that it may be properly managed.

I have been shown a list of current board members, staff members, suppliers and partners, which is attached to this declaration.

I hereby declare that I have no known personal or business relationships or interests with any other staff member, board member, current supplier or contractor, except for:

Name	Nature of relationship
1.	
2.	
3.	

I further state that I will declare any conflict or interest arising during the year as soon as I become aware of it.

Name:

Sign:

Date:

The signed form should be filed on a conflicts declaration file, with a copy on the personal file. The individual may retain a copy of the lists if they wish.

Appendix 2 – Declaration of Conflict of Interest Form

Conflict of interest declaration form

This form should be completed by any staff or board member who becomes aware of a conflict of interest arising during the year. It should be filed as soon as the individual becomes aware of the conflict.

Name:	
Position:	

I understand that a conflict of interest arises if an employee or a Board Member has an interest, relationship, or friendship which could, or could be seen to, interfere with their ability to decide an issue in the best interests of the Cordelia Foundation. I understand that the existence of a conflict of interest does not constitute a breach of policy, so long as it is declared, so that it may be properly managed.

I hereby declare the following conflict of interest:

Name of person or organisation	
Nature of conflict	
Date conflict arose	

Sign:

Date:

To be completed by the Medical Director:

Actions taken to mitigate risk of above declared conflict:

Name:

Sign:

Date:

The signed form should be filed on a conflicts declaration file, with a copy on the personal file.