



AMPLIFYCHANGE

# Conflict of Interest Policy

Document Control	
Approved By	AmplifyChange Directors
Responsible Owner:	CEO, Operations Manager
Created:	1 June 2021
Revised:	
Approved:	
Next Review:	
Version	1



# Table of contents

1. Introduction .....	1
2. Scope.....	1
3. Definition of Conflict of Interest .....	1
Annex 1: Conflict of Interest Declaration Form .....	4

Photo credits

Cover, right: Coalition on Violence Against Women, Kenya



## 1. Introduction

AmplifyChange’s vision is full attainment of Sexual and Reproductive Health and Rights (SRHR) for all, including women and girls, young people, and the vulnerable and marginalised. Our mission is to be the global leader in supporting grassroots organisations and building stronger, more inclusive movements for SRHR, especially in challenging contexts. AmplifyChange is committed to ensuring the highest standards of conduct in the delivery of our services. This is reinforced by our Articles of Association, and all related policies.

We acknowledge that conflicts of interest can occur during activities and can adversely affect AmplifyChange’s reputation and effectiveness. This policy sets out the standards expected and how to manage any perceived or actual conflict of interest. The guidance in this policy is informed by UK legislation and regulations which AmplifyChange remains subject to. We will also adhere to equivalent applicable legislation in other countries where we operate or deliver services.

## 2. Scope

This policy applies to all staff on a permanent or fixed term contract, and to all associated individuals, contractors and third-party representatives engaged by AmplifyChange in the UK or overseas. All contractors and agents acting for and on behalf of AmplifyChange should be made aware of this policy.

This policy applies to all personal, financial or political conflicts of interest.

## 3. Definition of Conflict of Interest

A conflict of interest is a set of circumstances that creates a risk that an individual’s ability to apply sound judgement or act in one’s role is, or could be, impaired or influenced by a secondary interest. It can occur in any situation where an individual or organisation (private or government) can exploit a professional or official role for personal or other benefit.

Conflicts can exist if the circumstances create a risk that decisions may be influenced, regardless of whether the individual benefits. The perception of competing interests, impaired judgement or undue influence can also be a conflict of interest. Potential conflicts of interest are most frequently grouped in these broad categories:

- **Organisational Conflict of Interest** is where AmplifyChange is

dealing with a similar subject for two different clients with competing or inconsistent interests.

- **Individual Conflict of Interest** is where an individual (e.g. director, staff, consultant or third party) has financial, previous employment, or other personal interest in the affairs of a client or grantee of AmplifyChange, a competitor of that client, or one client of our suppliers or competitors. Individual conflict of interests may be direct or indirect e.g., where the individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest (e.g., spouse/partner, close relative, close friend, business partner).

### Identifying conflict of interest

Conflicts of interest are a common and unavoidable part of management that can arise in a range of situations and environments. AmplifyChange’s approach is to recognise that these risks will arise and to put measures in place to identify and manage conflicts when they arise.

Within the activities conducted by AmplifyChange, conflicts of interest are more likely to arise where individuals or organisations we are transacting with have interests in the grantees we support. This includes practises such as:

- Commissioning and procurement decisions,
- Recruiting staff,
- Partnering with other organisations; and when receiving gifts,
- Selection and scoring decisions of grantees as part of a fund management process, or
- Delivery of policy advice and technical assistance to third parties.

### Conflicts may occur in the following situations:

- When an individual’s financial or political interests affect their responsibilities and duty to AmplifyChange.
- Where an individual’s financial or political interests compromise, or undermine the decision-making process or integrity of AmplifyChange’s business services and the quality of its services.
- Where an individual uses their position within AmplifyChange to benefit themselves, or a party that they are connected to, to further their financial or political position.



Specific examples of conflict scenarios include:

- A Grants Manager advocating to endorse a grant for an organisation, which they are connected to, for example if they are a Board member for the organisation in question.
- A Manager advocating to select an organisation or consultant in return for a financial gift. Please also see Anticorruption and Bribery policy for details for 'Gifts and Hospitality'.
- Technical Review Panel member reviews a funding application of an organisation they are involved with e.g., as a Board member.

**Managing conflicts of interest**

All individuals involved in the decision-making processes have a duty to identify and disclose actual or potential conflicts of interest. On an annual basis, all Members, Directors, employees and contractors should routinely declare all private, personal and financial interests relevant to their jobs in relation to:

- Decision-making, and
- Management of contracts.

All individuals involved in the decision-making must complete the "Conflict of Interest Declaration Form" (Annex 1) to declare any known conflicts of interest or to make a nil return. On an ongoing basis, individuals have the responsibility to identify actual or potential conflict of interests, which were not known at the point of signing the declaration form. As soon as they become aware of such conflict, it should be declared to AmplifyChange. In such an instance, AmplifyChange will advise on next steps.

**Resolving conflicts of Interest**

Individuals, contractors, suppliers or grantees must first raise a potential conflict of interest with the responsible officer or line manager. The discussion should establish:

- What is the actual or perceived conflict of interest,
- Whether it is possible to continue with the activity but implement actions to mitigate any risk. This could include closer monitoring, revisions to plans, exclusions from decision making activities and disclosure of all relevant information to others involved in the process, and
- Whether to be excluded from the activity.

The individual or party concerned should then complete and submit Part A of

the "Conflict of Interest Declaration Form" to document the actual or perceived conflict of interest. Where it is quite clear to the responsible officer or line manager that there is no conflict of interest then individuals, contractors, suppliers or grantees may proceed with the action/activity proposed. The responsible officer/line manager should confirm this in writing to the individual, contractor, suppliers or grantee by completing Part B of the "Conflict of Interest Declaration Form". Final versions of the two form parts should be submitted to the CEO/Operations Manager for final sign off and registration in the "Conflict of Interest log".

**If the course of action cannot be agreed or is unclear, the manager should escalate the issue to the CEO/Operations Manager.**

**Once an actual or perceived conflict has been identified the following steps must be taken:**

- The individual completes Part A of the "Conflict of Interest Declaration" form and submits this to line manager (if applicable) or the CEO/Operations Manager,
- The individual, line manager and CEO/Operations Manager reviews Part A of the "Conflict of Interest Declaration" form and agree mitigation actions and timelines (if applicable) in Part B of the form. For all proposed mitigation actions, reasons for reaching the decisions must be given to the parties concerned by the CEO/Operations Manager,
- All parties concerned subsequently sign on the form to confirm awareness of the conflict(s) of interest and agree to the mitigation actions, and
- The CEO/Operations Manager updates AmplifyChange' "Conflict of Interest Log", with details of the decision and mitigating actions.

**Monitoring and training on conflicts of interest**

Training on the Conflict of Interest policy is mandatory for all AmplifyChange staff. All new staff and consultants (where applicable) will receive training on this policy and the related policies and procedures referred to above.

Refresher training will be conducted on a regular basis for existing personnel, and managers should include conflict of interest in their agendas for team meetings. This will ensure we are reinforcing our desire to respect the information of data subjects and promote best practice and consistent standards.



### **Suppliers, grantees and their on-grantees/ implementing partners**

As a matter of good practice, other organisations and individuals working with AmplifyChange, will be expected to have read and comply with this policy. It is expected that our grantees will take responsibility for ensuring an appropriate contract is in place with on-grantees/implementing partners to ensure compliance with this policy.

### **Keys to Compliance – “Dos and Don’ts”**

#### Do Not:

- Misuse information acquired in the course of duties,
- Disclose official information without authority. This duty continues to apply after the end of a contract,
- Take part in any political or public activity which compromises or might seem to compromise your impartiality,
- Misuse your official position to further your own or others private interests,
- Give the impression that you have or may have been influenced by a gift or consideration to show favour or disfavour to a person or organisation,
- Abuse or ignore procedures relating to the provision of official entertainment and retreats,
- Take on roles in other organisations or companies funded by one of our donors unless an exemption has been agreed in writing, and/or
- Behave in a way which could give rise to suspicion of any real or perceived conflict of interest between official duty and private interests.

#### Always do the following:

- Declare any personal or financial interest in partners, contractors, suppliers or other third parties so that professionalism is not compromised,
- Be aware of special conflict of interest rules in the contracts with our donors,
- Avoid situations where a reasonable person would question whether there was inappropriate influence involved in an activity and/or decision,
- Deal with partners, consultants, suppliers, and everyone interacting with AmplifyChange in an objective, professional and fair manner, and

- Ensure that there is separation of duties/decision making.

### **Non-Compliance**

Failure to disclose an actual or perceived conflict of interest will be investigated by AmplifyChange and may result in disciplinary action and, in serious cases, dismissal. Further, any criminal offences will also be considered for referral to the relevant authorities.



### Annex 1: Conflict of Interest Declaration Form

The purpose of this Conflict of Interest Declaration is to identify any potential conflict of interests for employees, individuals and organisations working with AmplifyChange.

All individuals and organisations associated with AmplifyChange must disclose any circumstances, including personal, financial and business activities that will, or might, give rise to a conflict of interest during their work with AmplifyChange. This includes declaring any ongoing interests in other organisations that the individual has an interest in (such as a board member, affiliate or stakeholder).

On an ongoing basis, individuals and organisations have the responsibility to identify actual or potential conflict of interests which were not known at the point of signing the declaration form. As soon as they become aware of such conflict, it should be declared to AmplifyChange. In such an instance, AmplifyChange will advise on next steps.

Please complete the form below identifying any interests which AmplifyChange should be aware of. Send the signed declaration form to your line manager (if relevant) and Operations Manager.

Part A: Declaration of Interests	
Name:	
Position:	
I have no conflict of interest to declare <input type="checkbox"/> (Please check box if you have no conflict of interest).	
Or	
I have the following conflicts of interest to declare. (Please provide a description of the conflict of interest and how it impacts on your work).	Date Identified or commenced
1.	
2.	



**Declaration**

I declare that the information above is correct and that no other current or potential conflict of interest is known to me. I will inform AmplifyChange of any changes in these circumstances.

**Signed:**

**Date:**



Part B is only to be completed by the concerned party declaring conflicts of interests, line manager (if relevant) and Operations Manager.

Part B: Detailed Conflicts of Interest and Mitigation Actions					
<p><b>In my opinion the details provided (please check appropriate box) below.</b></p> <p><input type="checkbox"/> do not constitute an actual, potential or perceived conflict of interest by [Name of Individual, Contractor, Supplier or Grantee]. The activity can proceed.</p> <p><input type="checkbox"/> do constitute an actual, potential or perceived conflict of interest by <b>Name of Individual, Contractor, Supplier or Grantee</b>. and provide the detailed action plan below.</p>					
No.	Type of Interest	Description of Interest (Including for indirect interests, details of the relation with the person who has the interest)	Date Interest Relates		Action to be taken to mitigate risk (to be agreed with line manager and Operations Manager)
			From	To	
1.					
Declarations					
I declare that the information above is correct and that no other current or potential conflict of interest is known to me. I will abide the proposed actions to mitigate the identified conflicts of interest and will inform AmplifyChange of any changes in these circumstances.					
Name:		Signed:		Date:	
Company Statements					
I confirm that I have been made aware of the above declaration and will manage any potential conflicts appropriately. <b>I will ensure this action plan is reviewed: [ please specify timeframe for the review]</b>					
Name:		Position	Signed:		Date:
Name:		Position	Signed:		Date: