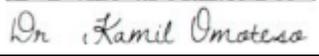


Policy: Conflict of Interest – Personal Gain

Policy number: HAPC/POL/CPG

Responsible department/Policy Owner:	P&C
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Associated Documents:	Process Maps Related Forms

Date approved by Board of Directors:	Jan 05 2021	Signature: 	Print name: Dr Mohamed Ashmawey
Date approved by Board of Trustees:	Jan 09 2021	Signature: 	Print name: Dr Kamil Omotesa

Revision History & Summary of Changes

Revision History Summary of changes and justification	Changes reviewed & approved by	Date of review & approval	Date effective
Version 1- <ul style="list-style-type: none">Creation of Handbook		Jan 05 2021 Jan 05 2021	Jan 05 2021

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Conflict of Interest – Personal Gain

1. Policy Statement

1.1. A conflict of interest occurs when a person's personal interests are, or could be in conflict with, the objectives and/or values of Human Appeal or could reasonably be considered to affect their impartiality, judgement, or the effectiveness expected from an individual in their role at Human Appeal, such that it could result in some detriment to Human Appeal and undermine the work of the organisation.

1.2. Human Appeal wishes to ensure that the decisions, judgements and effectiveness of all working for, or on behalf of, Human Appeal are, and appear to be, unbiased, impartial, and solely and wholly for the benefit of the charity. Individuals working for, and on behalf of, Human Appeal shall not affect, or appear to affect, the impartiality, judgement or effectiveness expected from them in their role, and abuse that relationship to the detriment of others, or be in apposition where they are perceived by others to be in position to do so.

2. Policy Objective

2.1. To ensure that decisions made by any person for and on behalf of Human Appeal are made purely on the basis of what is in the best interests of the organisation and clearly support its objectives. Those whose personal interest or loyalties to a person or organisation affect, appear to affect, or could reasonably be considered to affect, the impartiality, judgement or effectiveness expected of them in their role, are required to ensure that decision making cannot be compromised, by making the conflict of interest, or potential for conflict of interest, known through some appropriate declaration of that conflict, and explanation of their interests, that will allow for arrangements to then be made that ensure there can be no undue influence on any decision or judgement; and records will be maintained that reflect the proper management of such matters that will demonstrate the integrity of such judgements or decisions to be free of any conflict of interest.

3. Roles and Responsibilities

3.1. Each situation will dictate who is responsible for acting to manage that situation so as to ensure that there is no conflict of interest in the decision or judgement making, but ultimately it is the Board of Directors who shall exercise such control and answer to the Trustees on such matters, applying the following principles.

3.2. In particular, Human Appeal will ensure that its processes for management and authorisation of financial transactions, procurement, granting of financial or other aid authorisation recruitment, and grants award meetings and other activities where there is potential for risk of conflict of interest to occur, such they provide a commensurate level of consideration of such matters and protection to Human Appeal objectives.

3.3. It will fall within the duties of all line managers to take positive steps to review that work under their jurisdiction to review that work for signs that any conflict of interest may be occurring and takes such steps to deal with any concerns that they may have, particularly where financial or monetary management is involved.

3.4. The role of the Internal Audit Department shall encompass within its work, a level of checking for conflicts of interest that is commensurate with the potential for harm arising from such risks occurring.

4. Policy Provisions

4.1. Managing a conflict of interest:

4.1.1. Each employee is obliged to declare to their line manager, where they consider that their personal circumstances could potentially be in conflict, or could be seen or considered by others, to be in conflict with their obligations and duties to Human Appeal.

4.1.2. Any employee, regardless of their level or line reporting within the organisation will always have the opportunity to declare a conflict of interest to a Director, or discuss the potential for such a conflict to exist.

4.1.3. Where a Director considers that he/she may be in a position where a conflict of interest exists or has potential to exist must declare such to the CEO, and in respect of the CEO, he/she must make such a declaration to the Board of Trustees.

4.1.4. Any Trustee must make a declaration of a conflict of interest or potential for such a conflict to all other Trustees.

4.1.5. A declaration may be made verbally initially or in writing, but it shall be for the person making the declaration and the person to whom the declaration is being made, to produce a formal written record of the declaration that describes the situation, identifies the conflicts or potential for a conflict of interest, and what actions are to be taken in consequence. All such written declarations will be submitted for review by the Board of Directors, and any declaration that involves a Director will be submitted for review by the Board of Trustees.

4.1.6. The Trustees and the Board of Directors (including the CEO) are required to make an annual written declaration of any financial and pecuniary interests that might conflict with the interests of Human Appeal, and any gifts or hospitality received in connection with their role in HA, regardless of their actual value.

4.1.7. Declaration of any conflict of interests are the first agenda item on any meeting of the Trustees or Board of Directors.

4.2. Reporting a Concern:

4.2.1. Any person who has a concern or suspicion that there is a conflict of interest that may have not been declared by the person or persons concerned should use the whistleblowing procedure to report their concern or suspicions.