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 **Integrated Service on Health and Development Organization**

 **ISHDO**

 **CONFLICT OF INTEREST POLICY**

 **June 2020**

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# Purpose

Conflict of Interest refers to any case where an employee’s personal interest might contradict to the interest of the organization they work for. This situation may take many different forms that include, but are not limited to the examples mentioned below:

* Employees engaging in activities that will bring direct or indirect advantage but distractive to the organization
* Employees using connections obtained through the organization for their own private purposes
* Employees using the organization’s property to support an external business
* Employees acting in ways that may compromise the organization’s legality (e.g. taking bribes or bribing representatives of legal authorities)

The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. Therefore, when an employee understands or suspects that a conflict of interest exists, they should bring this matter to the attention of management so corrective actions may be taken. Supervisors must also keep an eye on potential conflict of interests of their subordinates.

The responsibility of resolving a conflict of interest starts from the immediate supervisor and may reach senior management. All conflicts of interest will be resolved as fairly as possible. Senior management has the responsibility of the final decision when a solution cannot be found.

In general, employees are advised to refrain from letting personal and/or financial interests and external activities come into opposition with the organization’s fundamental interests.

 This is an unwanted circumstance as it may have heavy implications on the employee’s judgment and commitment to the organization and by extension to the realization of its goals. This policy will outline the rules regarding conflict of interest and the responsibilities of employees and the organization in resolving any such discrepancies.

# Policy Statement

The relationship of the organization with its employees should be based on mutual trust. As the organization is committed to preserve the interests of people under its employment, it expects them to act only towards its own fundamental interests. Conflict of interest may occur whenever an employee’s interest in a particular subject may lead them to actions, activities or relationships that undermine the organization and may place it to disadvantage. Even the appearance of a conflict of interest has the potential to damage the organization. For that reason, it is essential that all conflicts of interest and potential conflicts of interest are disclosed and managed correctly in accordance with this policy.

# Scope

The policy applies to Integrated Service on Health and Development Organization (ISHDO) and its employees and to all paid and unpaid consultants and contractors and volunteers that provide supplies, services or support, to ISHDO’s work location. All such parties are referred to as “employee” in this document. This Policy also applies to ISHDO’s partners, vendors and other third parties, where it is included or referenced in relevant bid or tender documents, agreements, memorandums, purchase orders or contracts.

# Approach

The approach in this policy is one of disclosure rather than automatic prohibition of transactions that may give rise to a conflict of interest. Once disclosed, potential conflicts of interest will be considered and appropriate actions to address conflicts of interest will be decided on a case by case basis. When deciding whether a potential conflict of interest should be disclosed, consider the situation from the perspective of an outsider and if in doubt mistakes are committed on the side of disclosure. Even an unfounded perception of bad behavior can potentially be damaging to the status of ISHDO. This policy cannot describe all conflicts of interest, and its application may be uncertain at times. Sound judgment need to be exercised and respect the spirit as well as the wording of this policy and to make sure that you avoid any appearance of bad behavior.

# Disclosure

Interests will be recorded on the organization’s register of interests, which will be maintained by the secretary of the organization. The information will be processed only to ensure that directors and senior staff act in the best interests of ISHDO. The information provided will not be used for any other purpose.

Upon commencement of employment or appointment to the Board, each employee or director is required to disclose fully any interests such as relationships or posts held that could potentially result in a conflict of interest. Thereafter all employees and directors are required to re declare annually.

* This disclosure will be kept on file and updated as and when any other potential or actual conflicts of interest arise. It is the responsibility of every ISHDO board member and employee to report new conflicts of interest as they arise rather than waiting to be asked to update their declaration of interest.
* If there is conflict of interest that is not disclosed already, promptly update the conflict of interest and give it to your line manager. If the line manager believes there is a conflict that warrants further discussion, s/he will share the information with the Executive Director. In all cases, the line manager will document the reporting of a possible conflict of interest and his/her decision to discuss with the Executive Director or not, as the case may be.
* In the context of a procurement that is put out to tender, each member of the relevant evaluation committee will complete and sign the declaration for Members of Tender Evaluation Committees prior to commencing the evaluation process.
* All potential or actual conflicts of interest which involve the use of funds received from institutional donors will be communicated to the Grants Manager and to the Executive Director at the head office.

# Other Steps to Address Conflict of Interest

In most cases it will be sufficient to remove the person affected from any involvement in the matter giving rise to the conflict of interest so that ISHDO can proceed with the matter in an impartial and objective manner. However, in some circumstances, further steps may be required to address a significant or ongoing conflict of interest. These may involve recruiting a third party to assist; removing the individual affected from relevant duties, requiring an individual to give up a private interest or, in exceptional cases, resignation.

# Approval in Cases of Material Benefit

If ISHDO’s Board member or employee will receive a material benefit as a result of a conflict of interest where there is a material benefit, ISHDO will enter into the transaction only with the approval of the Grants and Compliance Manager as well as the approval of the Board.

# Exclusivity of Service

During employment with ISHDO one shall devote full time and attention to one’s duties with ISHDO and shall not (without the prior written consent of ISHDO) directly or indirectly either on one’s own account or on behalf of any other person, company, business entity or other organization’s engagement, or be concerned with, or provide services to any other business or accept any other engagement or office.

ISHDO encourages non-profit service outside ISHDO’s engagement. However, such service as a director, trustee or committee member, or as an advisor, constitutes a potential conflict of interest.

# Sanctions

Violations of this policy may subject to ISHDO’s disciplinary measures up to and including dismissal.

# Monitoring

ISHDO shall monitor the implementation of this policy on a regular basis (minimum annually). This policy will be periodically reviewed and updated as appropriate.

# Annex 1

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 **Integrated Service on Health and Development Organization (ISHDO)**

# Conflict of Interest Disclosure Form

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_

Position (employee/volunteer/Board): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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 ISHDO and your personal interests, financial or otherwise:

 \_\_\_\_\_ I have no conflict of interest to report

\_\_\_\_\_ I have the following conflict of interest to report

1.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

2.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

3.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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 Conflict-of-Interest Policy of ISHDO.

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# ANNEX: 2 ACKNOWLEDGEMENT AND ACCEPTANCE



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 **Integrated service on Health and Development Organization (ISHDO)**

**CONFLICT OF INTEREST POLICY of ISHDO**

I \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ certify and acknowledge the following:

* I have received a copy of the ISHDO’s Conflict of Interest Policy.
* I understand this policy is subject to change or may be revised by ISHDO.
* I understand that it is my responsibility to read and comply with this policy, and any revisions, and that I am bound by the provisions contained within.
* I understand that my continued employment or engagement with ISHDO is contingent on compliance with this policy.

**Print Name:** ‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐

**Date:** ‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐

**Job Title:**  ‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐

**Signature: ‐**‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐‐