

# Malaria Consortium

## Conflict of Interest Policy



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## 1 Purpose and context

The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise as a result of our work. This policy applies to all staff, volunteers and other individuals whenever they interact or potentially interact with the organisation.

## 2 Principles

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety. All relevant staff and other individuals have a responsibility to be aware of the potential for a conflict of interest. It is likely that individuals working in Malaria Consortium will encounter potential conflicts of interest from time to time. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards or reputation of Malaria Consortium.

Staff have a legal obligation to act in the best interests of Malaria Consortium and to avoid situations where there may be a potential conflict of interest.

## 3 Definition and terms

A conflict of interest is a situation in which an individual's personal or family interests or and/or loyalties conflict and may undermine interests with those of Malaria Consortium. Such conflicts may create problems as they can:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of Malaria Consortium, and
- Risk the impression that Malaria Consortium or its staff has acted improperly.

These may occur when:

- An individual has a position of authority in another organisation which conflicts with their role in Malaria Consortium
- When an individual has personal interests that conflict with their professional position at Malaria Consortium
- When someone works for or carries out work on Malaria Consortium's behalf, but who may have personal interests, including relatives or friends, either paid or unpaid, in another business which provides similar services.

## 4 Scope

The Country Director is responsible for communicating the Conflict of Interest Policy to all relevant individuals within their areas of responsibility on an annual basis. Regional Programme Directors are responsible for communicating this policy to regional staff and the Chief Finance Officer to staff in HQ on an annual basis. Line managers are responsible for ensuring that their staff are aware of the conflict of interest policy, as part of the induction.

## 5 Implementation

### Declaration of Interests

All staff are required to declare their interests. A declaration of interests form is provided on joining the organisation listing the types of interest to be declared. The most important feature of the policy is the requirement that an individual, if in any doubt whether or not an activity represents a conflict of interest, discloses that activity. If in doubt, report it!

Every employee completes the declaration of interest on joining the organisation, on an annual update and in addition if any changes occur in required declarations. If you are not sure what to declare, or if your declaration needs to be updated, please err on the side of caution. One that often gets missed is a declaration of any personal relationships within the organisation, either on joining or subsequently, these need to be included as detailed on the declaration form. If you would like to discuss declarations, please contact the Chief Finance Officer or HR Director.

The declaration of interest forms will be monitored and held by the HR focal point on staff records. The forms will be accessible by the Country Director, internal and external auditors and to regional and HQ staff performing checks on visits to the country.

Declarations of interest are not limited to the annual declaration or the notification of changes. Staff must consider any potential conflict in all work that they undertake. This can include, but is not limited to recruitment, procurement and contracting.

At all Procurement Committee Meetings, declarations of any interest or confirmation of no interest must be declared prior to each and every procurement considered by each member.

Any individual considering taking on additional paid work (on either an employed or self-employed basis) or voluntary work outside Malaria Consortium must seek the Country Director's written agreement beforehand, as stipulated in their contract of employment. An individual must not take on any such activities that could be deemed to compete or conflict with Malaria Consortium's activities or values.

### What to do if you face a Conflict of Interest?

Where there is a potential or actual conflict of interest the individual and line manager are responsible for ensuring that the issue is documented carefully. Any conflict of interest is to be declared at the earliest opportunity and the person is withdrawn from any subsequent part of the process as requested. If a situation occurs where a conflict of interest is not declared and it is believed to impact the outcome of a decision, then the issue must be escalated in accordance with Malaria Consortium's Whistle Blowing policy.

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