



Conflict of Interest

Name of policy:	Conflict of Interest
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Lead:	Director of Resources
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Purpose

This policy is designed to help all War Child representatives - including (but not limited to) employees, interns, volunteers, trustees and partners - understand conflicts of interest: what they are, how they can be avoided and how to manage them when they are identified. The overarching consideration is to protect the interests of War Child and its beneficiaries.

1. Conflict of interest: what is it?

A conflict of interest is a situation where financial or other personal or professional considerations such as personal relations, emotional life, political or national affinity - compromise an individual's objectivity, professional judgment, professional integrity, and/or ability to perform his or her responsibilities at War Child.

A conflict of interest may either be actual or perceived; perceived risk occurs when an independent person could reasonably assume that a conflict of interest exists, even if the person involved does not believe such conflict exists. Both actual and perceived conflict of interest are considered under this policy.

Types of conflict of interest

Some examples of common conflict of interests:

- A representative has a financial interest or close personal relationship to someone of influence in a company which provides goods/services to War Child;
- A representative receives a gift from a potential vendor who they then contract for War Child without following procurement procedure;
- A representative has a close personal relationship with another representative which may affect or may perceive to affect their objectivity;
- A member of recruitment panel has a personal relationship with a candidate.

While the above list provides some examples, it is not possible to include all possible situations in this document. In case of doubt, please check with your line manager (or equivalent) or the Director of Resources as the policy lead and remember that even perceived conflict of interests – where an independent person could reasonably assume that a conflict of interest exists – must be addressed.

2. Avoiding a conflict of interest

All War Child representatives must:

- Seek to avoid situations in which they have a direct or indirect interest which conflicts with the interests of War Child
- Ensure that their private or personal interests do not influence their decisions, and that they do not use their position to obtain personal gain

Where an action presents an actual or perceived conflict of interest, the representative shall refrain from carrying out the action and refer the matter to their line manager (or equivalent) who will evaluate and confirm in writing whether or not a conflict of interest exists.

Where a conflict of interest is found to exist the line manager (or equivalent) must assess the risk associated with the conflict, propose mitigating measures and have this approved by the Director of Resources.

A potential or actual conflict of interest does not automatically mean that War Child will not enter into the action if sufficient mitigating factors can be put in place to alleviate the effects of the conflict of interest.

3. Managing conflict of interest

War Child representatives are expected to declare a conflict of interest as soon as they are made aware of it. In some cases there is also regular reporting expected from certain representatives:

Declaring a conflict of interest

Who	What
Trustees and SMT	Must provide a written declaration on any related party transactions ¹ on an annual basis.
Trustees	Must declare any conflict of interest at each board and committee meeting and all declarations must be minuted
All representatives	Must read the Code of Conduct (which includes conflict of interest) and sign the statement of commitment on an annual basis
All representatives	Must declare to your line manager (or equivalent) whenever you believe there to be a conflict of interest.

All conflict of interest declaration forms must be sent to the Executive Officer who will maintain a register of such declarations.

Dealing with common conflict of interests

Recruitment of staff

A panel member must declare when a conflict of interest exists or may potentially exist (e.g. a candidate is known to one of the panel members). The panel must then decide whether the person should remain on the panel, and if the composition of the panel can mitigate the conflict. Where a conflict of interest is declared, a member of the HR team must be part of the selection panel.

In case a conflict of interest was identified, the decision to appoint a candidate must be unanimous.

Awarding of contracts and recruitment of consultants

In general, where there is an actual or perceived conflict of interest that person should not be involved in assessing, awarding or subsequently managing any contracts or projects to any company or person with whom they have any financial or personal interest. Therefore, they should declare

¹ Document available from Executive Officer

any potential conflict of interests to their line manager prior to the start of a process or during a process if the potential conflict of interest only becomes apparent at a later stage.

Additionally, all members of the procurement committee must declare that they have no actual or perceived conflict of interest as part of this specific procurement, when they complete the bid analysis form².

Receipt of gifts and hospitality

Please refer to Section 5 of the [Anti-Bribery Policy](#) for War Child's policy on Gifts and Hospitality.

Documenting a conflict of interest

Any potential conflict of interest must be documented on the Conflict of Interest declaration form. This form must be approved by the Director of Resources where a conflict is found to exist. The completed form must also be sent to the Executive Director to add to the Conflict of Interest register.

4. Failing to declare a conflict of interest

We strive to avoid any actual or perceived unequal treatment while representing War Child. Declaring a conflict of interest protects the professional reputation of all War Child representatives, as well as War Child and the beneficiaries for whom we work.

The Conflict of Interest policy is a key element of the Code of Conduct and anyone who has been found purposefully not declaring such conflict may be subject to disciplinary action.

² Bid analysis used by London office:

<https://warchild.interactgo.com/Interact/Pages/Content/Document.aspx?id=9796>

Bid analysis used by country offices:

<https://warchild.interactgo.com/Interact/Pages/Content/Document.aspx?id=6417>