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*Institutional*

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Policy

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*Conflict of Interest*

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## Revision history

Version	Date	Name	Description
1	January 2021	CSO	Redeveloped policy
1.1	October 2022	AB	Updated

Owner: AB

Approved/revised date: October 2022

Category: Institutional Policy

1. What is the purpose and scope of this policy?

IMS staff members and members of the IMS Board must declare their adherence to this Conflict of Interest Policy by filling out, signing, and returning the enclosed statement (Appendix A).

This Conflict of Interest Policy covers all activities of IMS. The purpose of this Policy is to timely and adequately identify, manage, and mitigate actual and potential conflicts of interests and their (potential) consequences.

This Conflict of Interest Policy is principle-based and does not describe all possible situations in detail. Each person involved with IMS or acting on behalf of IMS is expected to avoid conflicts of interest and act in accordance with the spirit of this Policy and the prescribed procedures when a conflict of interest arises.

2. What is a conflict of interest?

A conflict of interest may exist in case a person involved with IMS or acting on behalf of IMS has a direct or indirect personal, financial, or business interest in a decision or action by IMS.

Some examples include:

Situation	Conflict example
A request for a grant	A staff member deciding on a grant request is also a board member of the applicant. Therefore, the staff member has a financial interest in the grant being awarded to a particular applicant.
Procurement of services	IMS wants to engage a third-party to provide services. An IMS board member offers her services. The board member has a financial interest in securing the contract.
Recruitment	A staff member participates in a hiring committee and discovers that a close friend (or relative) has applied for the position. The staff member has a personal interest in the job being awarded to a particular applicant.

3. Exceptions related to the structure of the IMS Board

- a. The IMS Board enjoys the representation of multiple civil society organizations, who share IMS' general objectives. The shared objectives are the very foundation of the structure of the IMS Board. Therefore, situations are likely to occur, where *Organization A*, represented on the IMS Board, stands to benefit indirectly from a decision by the IMS Board, because that decision may further both the objectives of IMS and the objectives of *Organization A*. While this policy acknowledges that potential conflicts of interest should be evaluated on a case-by-case basis, the situation involving Organization A generally does not constitute a conflict of interest, because the IMS board member representing Organization A only stand to benefit indirectly, he/she does not stand to gain direct material benefits.

4. What should you do if a (potential) conflict of interest arises?

If you become aware of a potential or actual conflict of interest, you should take the following actions:

Report the conflict to the appropriate person within IMS in accordance with the chart below:

Person reporting	Reporting to
IMS staff member	IMS member of Senior Management
IMS member of Senior Management	IMS Board
IMS Board Member	IMS Chair
IMS Chair	IMS member of Senior Management

Do not proceed with the decision or action unless and until you have received confirmation that you are allowed to do so.

5. What should the person receiving the report do?

The person receiving the report will consider all circumstances of the case.

If it is concluded that a conflict of interest exists, the person reporting will no longer be involved in the decision-making process. The person who received and evaluated the report will then either take the decision or delegate to a person who does not have a conflict of interest.

If it is concluded that there is no way to mitigate the conflict and the potential adverse effects for IMS are significant, the person receiving the report should not proceed with the relevant decision of action (e.g., they should deny the grant request or not engage the third party in relation to which the conflict of interests exists).

6. Register

All reported conflicts of interest, the report and the decision made (including the reasons thereof) will be documented and retained for a period of ten years. IMS Senior Management is responsible for the maintenance of this register.

**APPENDIX A: Declaration**

I promise that, within the limits of the position I hold or role I fulfil at any time in relation to IMS, I will:

- Execute my function ethically and with care;
- Comply with the laws, regulations and codes of conduct that apply to me, including the Conflict of Interest Policy;
- Keep confidential that which has been entrusted to me;
- Not abuse my knowledge;
- Act openly and accountably.

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Signature

By: [print name]

Date: