

CCFSA CLIMATE
CHANGE AND
FOOD
SECURITY
ASSOCIATION

Conflict of Interest Policy

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CONFLICT OF INTEREST POLICY

Member:	• all board members/trustees, board committee members • all the association employees, secondees, interns and volunteers; and • all consultants/contractors/suppliers (including internal consultants with an association email address) • all the association partners
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1. APPLIES TO

The association recognises that Members will develop relationships, friendships and contacts in their personal and working lives that may influence their objectivity. The majority of these relationships will not give rise to any concern and can be regarded as a private matter. However, a COI arises where one party in the relationship can grant the other an unfair advantage or disadvantage or can exert improper influence over a decision relating to the other, which attract or may attract perceptions of bias and unfair treatment.

This Conflict-of-Interest Policy ("COI Policy") seeks to set out the association's processes and procedures to address this matter and applies to all Members of the association.

"Members" are defined as:

- 1.1 all board members/trustees, board committee members and members of the association (as defined);
- 1.2 all employees of the association;
- 1.3 all secondees, interns and volunteers of the association;
- 1.4 all consultants/contractors/suppliers* (including internal consultants with the association email address) of the association; and
- 1.5 all the association partners (i.e. those entering into partnership agreements with the association)

2. PURPOSE

The association promotes a culture of transparency, integrity and professionalism at every level within the organisation.

The purpose of this COI Policy is to effectively identify, declare, manage and record all conflicts of interest ("COI") in a timely manner in order to:

- protect the integrity of the association's governance structure and decision-making processes;
- to encourage public trust and confidence; and
- to ensure Members' fundamental duty to act in the best interest of the charity.

3. WHAT IS A CONFLICT OF INTEREST?

A COI arises (actual/existing COI), may arise (potential COI), or appears to another person to arise (a belief/perception) where a member's personal, financial, business, political or family interest(s) and/or loyalty conflicts with the interests of the association.

We understand that COIs can and do arise from time to time. The problem is not that conflicts arise. The problem arises when they are not declared and managed appropriately.

Members will declare any interest, which might affect, or might reasonably be thought to affect impartial judgement. Not declaring interests could give rise to suspicion of improper motives even where none exist. The importance of transparency of judgements and transactions is paramount.

To help decide whether you have a COI, imagine you are explaining your actions and how it would appear to an external third party. Even the appearance of a COI has the potential to damage the association's reputation and to adversely affect the communities with whom we work. If in doubt, declare. Please see Appendix 1 to this COI Policy for a non-exhaustive list of COI examples.

4. DECLARATION OF INTEREST

The responsibility is on each individual Member to make their own declaration(s) of interest at the earliest opportunity once you become aware that a conflict exists or may exist.

There are two types of declarations of interest: (i) specific; and (ii) at any time.

4.1 Specific

Specific declarations of interest apply to all Members and must be made where a COI exists or may exist in the following situations:

Induction/Appointment

As part of your induction with the association, all new employees, secondees, interns, volunteers and internal consultants are required to submit a declaration of interest either electronically COI Declaration in hard copy as set out in Appendix 2A to this COI Policy. On appointment to the association board of directors or a board committee or as a member, all new board members/trustees, board committee members and members are required to submit a declaration of interest either electronically Board COI Declaration or in hard copy as set out in Appendix 2A to this COI Policy.

Director, Committee or Company Member

Any and all the association board members/trustees, board committee members and members are required to submit a declaration of interest before or at any such meetings where a COI arises or may arise in the business to be transacted at that meeting.

Procurement

All Members involved in the association's procurement processes are required to submit a declaration of interest where a COI arises or may arise either: (i) electronically COI Declaration or in hard copy, as per Appendix 2B to this COI Policy; or (ii) a hard copy procurement committee Nil declaration.

Recruitment

All Members involved in the recruitment and/or appointment of Members are required to submit a declaration of interest either electronically COI Declaration or in hard copy, as per Appendix 2B to this COI Policy.

Annually

All Members are required to submit an annual declaration of interest by 1 December each year, either electronically COI Declaration or in hard copy, as per Appendix 2B to this COI Policy. Submissions to be made annually between 1 November and 1 December.

Note: Specific declarations do not in any way detract from the obligation to immediately declare a COI as and when it arises in accordance with clause 4.2 (At any time) below. If you have previously declared a COI (actual or potential), you must make a new declaration annually but can refer to such existing/related declaration(s), including related declaration number.

4.2 At any time

Members must proactively declare any and all COIs as and when they arise in the course of their employment, or term of office or engagement as a consultants/contractors/suppliers/association partner with the association either electronically COI Declaration or in hard copy, as per Appendix 2B to this COI Policy.

Note: If you previously declared a COI (actual or potential) and the situation has altered, you must make a new declaration of such new or altered interest in accordance with this COI Policy but can also refer to the existing declaration(s).

5. WHAT TO DO WHEN YOU HAVE A COI (ACTUAL OR POTENTIAL)

To promote transparency and protect all parties involved, Members are required to declare all COIs (actual or potential) so that they are managed and recorded effectively. There are various stages in dealing with a COI ('specific' or 'at any time'): identify; declare; review; validate; confirm; action solution; and verify.

Note: please see Appendix 3 to this COI Policy for COI Reporting Matrix (HQ & Field) as this Clause 5 cannot cover all COI reporting eventualities.

IDENTIFY

a COI (actual or potential) and consult this COI Policy

Declarer must immediately step away from any involvement and have no further interaction until COI is reviewed and managed



DECLARATION OF INTEREST

as soon as you (“Declarer”) become aware of a COI – electronically HQ COI Declaration and Field COI Declaration or in hard copy

Pending Review
interim actions can
include stepping away
from the conflict/
committee /no
further participation
/Independent
member(s) added to
committee/decision



REVIEW AND SOLUTION PROPOSED		
Head Office Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Field Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Project directors/ Committee members/ Project members
Initial review by your management board; and solution proposed	Initial review by your Area Co- ordinator/ACDP or ACDS or equivalent and solution proposed	Raised at meeting of the association Board/Committee/AGM of relevant the association entity and reviewed/discussed



VALIDATION		
Head Office Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Field Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Project directors/ Committee members/ Project members
Management Board	Management Board	Management Board



CONFIRMATION by Head of Ethics & Compliance
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SOLUTION made within 5 working days from declaration (mandatory deadline)
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Pending Escalation
interim actions can
include stepping away
from the conflict/
committee
/No further participation
/Independent member(s)
added to committee/
decision



ESCALATION to senior level for a final decision (only if necessary/optional)		
Head Office Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Field Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Project directors/ Committee members/ Project members
Management Board	Management Board	Management Board



SOLUTION ACTIONED		
Head Office Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Field Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Project directors/ Committee members/ Project members
Management Board	Management Board	Management Board



FINAL VERIFICATION		
Head Office Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Field Employee/ Secondees/ Interns/Volunteers/ Internal Consultants	Project directors/ Committee members/ Project members
Management Board	Management Board	Management Board



RECORD COI on Board/Committee/Member Registers and Board minutes.

6. OVERSIGHT

6.1 COI Registers for each of Board/Committee/Member are controlled and monitored on a quarterly basis by the management board. High level information is reported to the association's members on a quarterly basis.

6.2 The management board reports on COI matters to the association's members on a quarterly basis.

6.3 Management Board can review and monitor the COI Register to analyse any trends to enhance awareness within the organisation and further learning and development. Global trends will be reviewed and monitored by the management board.

7. RAISING CONCERN

Where you believe a member is conflicted, and it is not declared or fully declared a COI, it is your duty to speak up. Please consult our Whistleblowing Policy on SharePoint or email to the association in confidence. In addition, if you have a serious concern over a wrongdoing, please contact the board members.

8. COMMUNICATION AND TRAINING

8.1 The association will effectively communicate and provide training on this COI Policy to all Members on induction/appointment.

8.2 This COI Policy will be reviewed annually.

9. COMPLIANCE WITH THIS POLICY

9.1 Compliance with all the association Policies, including this COI Policy, forms part of a member's annual appraisal.

9.2 Any violations of this COI Policy, including any failure to report a COI (actual or potential), will be dealt with in accordance with the association's Disciplinary Procedure and may result in a disciplinary sanction up to and including termination of employment or removal from the association board, or expulsion from being a committee member or member.

9.3 The association reserves the right to report any suspected fraudulent or criminal activities to the relevant authorities.

10. NATIONAL LAWS

For the avoidance of doubt, this COI Policy supplements laws that regulate COIs and related fiduciary duties, including but not limited to applicable company and charity law.

11. DATA PROTECTION

Any information provided to the association under this COI Policy will be processed in accordance with applicable data protection law and for the purposes set out herein. This will include the processing of information to ensure that Members act in the best interests of the association and that the association complies with the requirements of all donor contracts. Such information will be also declared in the association's accounts and annual report where required under applicable law or accounting guidelines.

APPENDIX 1

TYPES OF CONFLICTS OF INTEREST

While it is not possible to list every situation that could present a conflict, there are certain areas where conflicts typically arise, which include:

Financial Interests

- You or a Connected Person works for or is a director or owner of or is responsible for purchasing or selection decisions regarding one of a supplier or contractor that the association is considering using.
- A former association employee with whom you are familiar contacts you directly or indirectly on behalf of an organisation tendering for a contract from the association for which you have responsibility.
- A Member uses confidential information acquired as a result of their position within the association to further their private interests or those of a Connected Person.
- A Member provides advice or is otherwise involved in an organisation which competes for donor funding with or is in receipt of funding from the association.

Personal Interests

- A field office employee is in a position to make (or influence) a decision about allocation of resources or funds that could directly benefit their own community or their family's community.

Property Interests

- You (or a Connected Person) directly or indirectly lease, rent, trade or sell real or personal property to or from the association.

Family relationships

- A candidate/employee is a Connected Person of an association manager/employee/director who makes decisions on recruitment, job responsibilities, pay and promotions relating to that candidate/employee.

Outside activities or commitments

- You agree to serve as a director or in any other key role/decision making role in a business which is or seeks to be one of the association's competing charities or competitors, suppliers or implementing partners.

Social/political

- Participating in social or political activities is not restricted as long as you participate as an individual and not as a representative of the association. Such participation should not call into question your impartiality or affect your advice or actions within the association.

We must also be alert to any situation, affiliation and relationship that may create a potential COI, the appearance of impropriety or interfere with the discharge of your responsibilities on behalf of and in the best interests of the association. For example, working or volunteering with a Connected Person can present conflicts, especially if the functions you perform, or the division of duties interferes with objective decision making.

"Connected Person" includes spouse, co-habiting partner, child, parent, sibling, close associate or intimate friend.

This COI Policy cannot describe all COIs and therefore you will need to exercise sound judgement and respect the spirit as well as the wording of this Policy.

APPENDIX 2A
DECLARATION OF INTERESTS ON INDUCTION / APPOINTMENT
(CONFIDENTIAL)

Declarant's Name:	
Declarant's Address:	
1. Have you or a Connected Person* been a party to or involved in contractual transactions with the association or another charity? If 'yes', please provide details.	
2. Do you or a Connected Person* have an interest** in an entity (business, organisation or charity) with which the association does business or expects to do business? If 'yes', please provide full details of such interest** and the impact of such interest on the association. Please include the position/title held and if a Connected Person* has the interest, please identify the relationship of that person to you.	
3. List all the entities on whose board of directors/committees/members you currently serve and confirm whether any such entities: do business with; are involved in litigation with; or compete for funding with the association. Please provide full details.	
4. Please disclose any involvement by you in any activity within the preceding 12 months, or the next 12 months, that could be reasonably interpreted as a potential conflict of interest or could be reasonably perceived as having an appearance of a conflict of interest/divided loyalty on your part. Please provide full details.	
I hereby confirm that the Declarations made above is complete and correct to the best of my knowledge, information and belief. I will notify my Line Manager or Head of Department, as applicable, immediately upon knowing that these Declarations have become inaccurate or that I have otherwise not complied with the Conflict-of-Interest Policy.	
Print Name:	
Signature:	Date:

* Includes spouse, co-habiting partner, child, parent, sibling, close associate or intimate friend

** includes a financial, business, personal, contractual or organisational interest

Please use a continuation sheet where required.

APPENDIX 2B
DECLARATION OF INTEREST
(CONFIDENTIAL)

Date:

Name:

Position:
(e.g. employee, intern, volunteer, Internal consultant, board/committee or company member)

Department:

Fully state details of conflict of interest (actual or potential), including any interests, relationships, transactions, positions/posts you hold (volunteer or otherwise), or other circumstances where your interest's conflict with those of the association, including but not limited to personal, financial, business, political or family or otherwise.

If you do not have any conflict of interest (actual or potential) to declare, you must confirm this and submit a "Nil" return.

I hereby certify that the information set forth above is true and complete to the best of my knowledge (having made reasonable enquiries). I have reviewed, understand and agree to abide by the association's Conflict of Interest Policy.

The association respects your privacy and will take every measure to protect your personal information in compliance with relevant data protection legislation. I acknowledge that the association may be required to declare relevant personal details about me and my declaration of interest anywhere in the world, for use by the association to ensure compliance with its legal and regulatory obligations, including, but not limited to company law and charity law, and in order to comply with donor contracts.

Signature: _____ Date: _____