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CONFLICTS OF INTEREST POLICY

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Purpose of this Policy

The aim of this policy is to protect both MAG and the individuals involved from any impropriety or appearance of impropriety resulting from relationships which may create a conflict of interest.

This policy applies to all MAG trustees, UK and Programme Affiliated staff and volunteers.

Definitions

Conflict of Interest: A conflict of interest is any situation in which an individual's personal interests or relationships could influence, or could be perceived to influence, their ability to make impartial decisions in MAG's and its beneficiaries' best interests. Common types of conflicts of interest include:

- direct financial interests
- indirect financial interests
- non-financial personal interests
- involvement with external organisations

Register of UK Contracted HQ and International staff interests: internal record of interests declared by UK Contracted staff (Manchester based, Remote, Roving and Programme based International staff) and volunteers.

Link to Values

This policy particularly aligns with MAG's value of **integrity**, by which we act honestly and with transparency: All staff, volunteers and trustees are expected to avoid any conflict of interest between the interests of MAG and any other personal, professional or business interests. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest, even where a conflict of interest may not in fact exist.

Responsibilities

Trustees: All trustees have a legal duty to act only in the best interests of their charity. Under both charity law and company law, trustees of charitable companies must take careful steps to disclose interests and to manage conflicts of interest. Trustees are required to complete a Declaration of a Conflict of Interest form: i) prior to, or on, their first day of appointment to the Board of MAG; ii) as they arise during the course of a year; and iii) annually.

UK Contracted (Manchester Based, Remote, Roving and Programme International) staff: are required to complete a Declaration of Conflict of Interest form: i) prior to, or on, their first day of employment with MAG; ii) as they arise during the course of a year; and iii) annually. The UK HR team will arrange for new staff/volunteers to complete the form.

Programme Contracted (National) staff: with responsibility for any area relating to: financial transactions; requesting or procuring goods or services for MAG; and the recruitment of staff are required to complete a Declaration of Conflict of Interest form: i) prior to, or on, their first day of employment with MAG; ii) as they arise during the course of a year; and iii) annually.

Please see guidance documents for further information.

Policy statements

The Declaration of a Conflict of Interest form should also be updated when anything significant changes. New matters should not await an annual declaration before being declared. It is the responsibility of each individual staff member/volunteer to proactively declare any matters which they feel may present actual or potential conflicts, or the perception of such conflicts. Further, any actual or potential conflicts of interest should be declared verbally at any meeting where specific relevant conflicts may arise.

Any trustee, member of staff or volunteer either knowingly providing false information or withholding relevant information may be subject to disciplinary procedures.

Monitoring

A Register of Trustees' interests is maintained by MAG's Company Secretary in accordance with Article 22 of the Articles of Association. The Management Support Team (MST) maintains a register of completed forms on file in the Manchester office. Completed National staff forms are maintained on file in the programme by the Senior Manager in Country (SMiC).

Additionally all MAG tender processes require declarations of Conflict of Interests to be completed by the Procurement Committee members. This information is maintained within the Procurement files.

References

- **Conflict of Interest Guideline documents:**
 - Programme National Staff
 - Trustees / Leadership Team Members
 - UK / Programme Affiliated staff
- [Policy on Personal Conduct](#) and [Policy of Personal Conduct – non Staff](#)
- UK [Bribery Act 2010](#)
- [Gifts and Hospitality Policy](#)
- [Financial Misconduct and Crime Policy](#)
- Trustees Handbook
- MAG's Articles of Association

Contacts

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