

## Robert Carr Fund Conflict of Interest Handling for Grant Application Reviews and Contracts

*This policy document applies to ISC, PAP, Secretariat staff, external reviewers, volunteers and contractors*

### 1. Basis of Conflict of Interest handling

Aidsfonds legally serves as the Funds Management Agent (FMA) of the Robert Carr Fund (RCF). The [Conflict of Interest Policy of Aidsfonds](#) serves as a key element to the governance and activities of the Robert Carr Fund (RCF) for civil society networks. It applies to the activities and relationships of the International Steering Committee (ISC), the Program Advisory Panel (PAP), the Secretariat, and reviewers of RCF.

Additionally, Aidsfonds' [Integrity Breach Policy](#) applies to the staff and volunteers of Aidsfonds, and staff and volunteers of RCF. As soon as an integrity breach occurs the Integrity Breach Protocol as described in the policy comes into force.

With this policy and procedure Aidsfonds means to protect the organization and all individuals involved in the grantmaking process against any violations, mistakes and false accusations of a conflict of interest and to enable transparent and honest decision making. It requires from you that you familiarize yourself with the procedure and act accordingly. The most important thing is that we ask you to proactively disclose any affiliation that may lead to (the appearance of) a conflict of interest.

Questions about the policy should be directed to the Aidsfonds as FMA of the RCF. It is the duty (and is part of the ToRs) of all ISC members, PAP members, Secretariat staff and reviewers to be aware of this policy. All have a duty to disclose the existence of any actual or potential Conflict of Interest, including those that derive from associated persons or institutions, and the nature of such Conflict of Interest, whenever one becomes aware that a conflict exists or that a Conflict of Interest is reasonably likely to occur or that there is the appearance of a Conflict of Interest.

The Conflict of Interest Policy of Aidsfonds provides guidelines for identifying conflicts, disclosing conflicts and procedures to be followed to assist RCF to manage Conflicts of Interest and situations that may result in the appearance of a conflict.

### 2. Disclosure of Conflicts of Interest within RCF

The ISC, PAP, and Secretariat staff members will annually disclose and promptly update in writing if circumstances change which would change their Conflict of Interest.

The Annual Conflict of Interest Disclosure Statement requests the ISC, PAP, and Secretariat staff members to identify their interests that could give rise to conflicts of interest, substantial business or investment holdings, and other transactions or affiliations with businesses and other organizations or those of family members as well as networks applying for funding, grantees or other non-profit organizations or those of family members.

The ISC, PAP, and Secretariat staff members are also to disclose Conflict of Interest as they arise, as well as to disclose those situations that are evolving that may result in a Conflict of Interest. Disclosure must occur in writing. Disclosure must occur as soon as the person having the conflict is aware of the conflict/potential conflict or appearance of a conflict.

External reviewers, contractors and volunteers also have to disclose Conflicts of Interest to the Secretariat when they are approached to provide a service with the Fund.

All disclosures must be submitted to [secretariat@robertcarrfund.org](mailto:secretariat@robertcarrfund.org)

### 3. Procedures to manage Conflict of Interest in reviewing grant applications

For each interest disclosed, the Chair of the ISC, the Chair of the PAP, or the management of the FMA, as appropriate, will determine whether the Fund should: (a) take no action or (b) disclose the situation to the full ISC, PAP and FMA and invite discussion/resolution by the Chairs of the ISC and the PAP of what

action to take. The broadest disclosure possible (to the full ISC, PAP and FMA) is obligatory so that decision-makers can make informed decisions that are in the best interests of the Fund.

- When the Conflict of Interest involves a PAP, ISC member, or Secretariat staff member, the person with the conflict ("interested party"): (i) must fully disclose the conflict to the Secretariat (Fund Director); (ii) may not be involved in the decision by the Chairs of the ISC and PAP of what action to take (e.g., may not participate in discussions or a vote) but if requested may serve as a resource to provide other members with needed information.
- In all cases, decisions involving a Conflict of Interest will be made only by members without a Col (e.g. "disinterested members"). Only disinterested members will perform discussion and review of eligible proposals.
- All interested parties may be asked to recuse themselves from funding decision-making, and are not allowed to vote in the final funding decision.
- A majority of disinterested members (whenever possible) should approve the final funding decision.
- Minutes of the ISC, PAP, and Secretariat staff meetings will reflect when a reviewer discloses that they have a conflict of interest and how the Conflict of Interest was managed, such as that there was a discussion on the matter without the member in the room, and that a vote was taken but that the interested member abstained.
- The Secretariat and FMA will monitor proposed or on-going transactions of the Robert Carr Fund (e.g., contracts with grantees, donors and collaborations with third parties) for conflicts of interest and disclose them to the appropriate body, whether discovered before or after the transaction has occurred.

#### **4. Procedures to manage Conflict of Interest in service by Contractor or Volunteer**

For each interest disclosed, the Fund Director will determine whether the Fund should: (a) take no action or (b) weigh the impact of the Col on the service to be provided and decide if the contractor or volunteer should be assigned to the service.

#### **5. Undeclared Conflict of Interest**

It is the role of the Chairs of the ISC and PAP or the management of the FMA, to act upon these signals and if necessary, sanction members if there is evidence of Conflict of Interest that is knowingly undeclared. Possible sanctions may include disciplinary actions for staff, and dismissal from the ISC or PAP.

If the Secretariat identifies a (potential) conflict of interest, they must inform the Chairs of the ISC or PAP, or the FMA, in writing. (FMA staff follows the Integrity Breach Protocol).

If a breach of the Col policy could have any impact on grant selection, it is the duty of the Chairs of the ISC consulting the Chairs of the PAP to constitute a review committee to review whether the particular grant selection was appropriate and report back to the Chairs of ISC and PAP. The Chairs of the ISC will base their decision on the report of the review committee and the advice of the Chair of the PAP.

The Chair of the ISC reports immediately any suspicion of a possible undeclared Conflict of Interest to the executive director of the FMA. The executive director follows the obligatory Integrity Breach Protocol.

#### **6. Dissemination and Review**

At the beginning of the calendar year, the Secretariat shall provide any current and new ISC, PAP, and Secretariat staff members with a copy of this document along with an Annual Conflict of Interest Disclosure Statement form. The Secretariat will also provide the same to contractors and volunteers upon signing agreements of service.

## Annual Conflict of Interest Disclosure Statement

With regard to my service as member of the *International Steering Committee (ISC) / Program Advisory Panel (PAP) / Internal (Secretariat) or External Reviewer (Contractor or Volunteer)* of the Robert Carr Fund (RCF), this is to declare that I, except as described below, am not now nor at any time during the past year have been:

1. A participant, directly or indirectly, in any arrangement, agreement, investment, or other activity with any grant recipient, vendor, supplier, or other party doing business with the RCF which has resulted or could result in personal benefit to me.
2. A recipient, directly or indirectly, of any grant, salary payments or loans or gifts of any kind or any free service or discounts or other fees from or on behalf of any person or organization engaged in any transaction with the RCF.

Any exception to (1) or (2) are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have (or had during the past year) in the persons or organizations having transactions with the RCF.

<b>I would like to report the following <u>potential</u> conflict of interest:</b> <i>(Please elaborate on the potential conflict arising from the above situation with regard to the transaction concerned (e.g. nature of service / transaction involving the affiliated person, the identity of the affiliated person and your relationship with that person).</i>	
Area of Conflict	Details
I am affiliated* to another NGO/Non-profit organization/ CSO/or other related organization.	
I am affiliated* to any vendor, supplier, or any other party providing or bidding for providing services, having a direct or indirect interest in any financial transaction(s), agreement, or investment to the RCF or grantees of RCF.	
I am affiliated to someone who is a party to or has an interest in any pending legal proceedings involving RCF.	
I am interested or I am affiliated to person(s) who is/are interested in a grant from RCF.	
I am interested or affiliated to person(s) who is/are interested in providing services to RCF.	
I have business dealings or transactions with a vendor, supplier or any other party which could result in benefit for me.	
I am affiliated to any staff working for RCF.	
Others:	

\*Affiliated refers to being connected to another party who could be one of the following:

*Spouse, domestic partner, child, mother, father, brother or sister or close associates; any corporation, business or non-profit organization of which you serve as staff, officer, board member, partner, participate in management or are employed by; any trust or other estate in which you have a substantial interest or as to which you serve as a trustee or in a similar capacity.*

☒ I hereby confirm that the disclosure made above are complete and correct to the best of my information and belief.

☒ I shall not participate in the discussion and decision-making of the matter in question.

☒ I will notify the RCF secretariat and the FMA immediately if I come to know that this disclosure is inaccurate or that I have not complied with the [Conflict of Interest policy](#).

Signature	Name and Designation	Date