



CISV International Conflict of Interest Policy

PURPOSE

CISV International is both a Charity and a Company limited by guarantee (Charity Registration: 1073308; Company Registration: 3672838) incorporated under the laws of England and Wales. Maintenance of this status is important both for CISV's continued financial stability and for public support. Because CISV International is a charity, it is subject to scrutiny by and held accountable to governmental authorities, its Members, and the general public.

The purpose of this policy is to:

1. Ensure that CISV International, including all interested persons, operates in a manner consistent with its charitable purposes.
2. Ensure that CISV International, including all interested persons, does not engage in activities that could jeopardize its status as a charity.
3. Define appropriate behavior and actions when CISV International is faced with a potential conflict of interest.

This policy is intended to supplement but not replace any applicable laws governing conflict of interest applicable to charities.

DEFINITION OF A CONFLICT OF INTEREST

A conflict of interest is any situation in which an individual's personal or family interests, or interests which they owe to another body, and those of the charity arise simultaneously or appear to clash.

Conflicts of interests can occur with any person with substantial influence over CISV International or any person who, by virtue of their position, has the capacity to influence the actions of CISV International; and who also has a direct or indirect Financial Interest. This includes all Trustees, members of committees with board-delegated powers, financial advisors, and senior staff members, who are collectively referred to in this document as interested persons.

It is inevitable that conflicts of interest will occur. The issue is not the integrity of the interested person concerned but the management of any potential to profit from a person's position as an interested person, or for an interested person to be influenced by conflicting loyalties. Conflicts of interest may inhibit free discussion and also damage the charity's reputation by risking the impression that the charity has acted improperly.

COMMON SITUATIONS IN WHICH CONFLICTS OF INTERESTS OCCUR

1. Direct financial gain or benefit to an interested person, i.e. ownership in, investment interest in, or compensation arrangement with any entity with which CISV International enters into a transaction or agreement.
2. Indirect financial gain or benefit to an interested person, i.e. employment of a spouse, partner, or family member by the charity; gifts; or favors

3. The sale of land to an interested person
4. Use of trustee's property by the charity
5. Conflicts of loyalties

PROCEDURES

1. Duty to Disclose

If an interested person has any actual or possible conflict of interest, he/she must disclose the conflict and be given the opportunity to share all facts surrounding the conflict to the charity as soon as it arises. It is the ongoing responsibility of all interested persons to examine their own transactions, outside business interests and relationships for potential conflicts and to immediately disclose them. Disclosures should be made to the Chair of the Board (or if he or she is the one with the conflict, then to the Vice-Chair). Disclosure by a non-board member may also be made to the Secretary General.

2. Determining Whether a Conflict of Interest Exists

After disclosing the financial interest and all important facts and the following discussion with Board or committee, the interested person shall leave the Board or committee meeting while the remaining Trustees or committee members decide by vote if a conflict of interest exists. The Board or committee should make their decision based on the welfare of CISV International and their decision will be final.

3. Procedures for Addressing the Conflict of Interest

- a. An interested person may make a presentation to the Board or committee, but after such presentation, he/she shall leave the meeting during the discussion of, and the vote on, the conflict of interest.
- b. The Chair of the Board or committee shall as appropriate appoint a disinterested person or committee to investigate alternatives to the conflict. Where applicable, a competitive bid or comparison shall be made.
- c. After exercising due diligence, the Board or committee shall determine whether the organization can obtain a better transaction or agreement from a person or entity that will not have a conflict of interest. If one can be found the Board or committee shall choose it over a one that creates a conflict of interest.
- d. If a better transaction or agreement that does not produce a conflict is not possible, the disinterested Board or committee members will vote on whether to enter into the transaction with conflict. When voting, the Board or committee shall consider whether the transaction or agreement is in the best interest of and is fair and reasonable to CISV International.
- e. If an interested person will receive a benefit from the transaction, the Board will need to verify that the action is authorized by CISV International's governing documents. If yes, the Trustees must ensure that the authority is used appropriately and that the conflict is appropriately managed. If no, the Trustees will need to apply to the UK Charity Commission for the necessary authority.

- f. If an interested person has a conflict of interest, that person must not be involved in managing a contract in which he/she has a material interest.
 - g. Details of the conflict of interest should be recorded in the minutes as outlined in the Records of Proceedings section of this document.
4. Violations of the Conflicts of Interest Policy
- a. If the Board or committee has reasonable cause to believe that an interested person has not disclosed actual or possible conflicts of interest, it shall inform the interested person of the suspected conflict and give him or her the opportunity to explain the situation. If needed, the Board or committee may make an investigation into the situation.
 - b. If the Board determines that the interested person has not disclosed an actual or possible conflict of interest, it shall take appropriate corrective action to protect the interests of CISV International. This action could include removal of the individual from his/her position.

RECORDS OF PROCEEDINGS

The Board, or a duly constituted committee thereof, shall document discussion and/or votes related to conflicts of interest in its minutes. This documentation shall contain:

- a. The names of the persons who disclosed or were found to have an actual or possible conflict of interest,
- b. the nature of any financial interest of the conflict,
- c. any action taken to determine whether a conflict of interest was present,
- d. the Board's or committee's decision as to whether a conflict of interest exists.
- e. steps for managing the conflict of interest, if one does exist.

The minutes shall also include the names of all persons who were present for discussions and votes relating to the transaction or agreement, the content of the discussion, including any alternatives to the proposed transaction or agreement, and a record of any votes taken.

ANNUAL NOTICE OF POLICY AND DISCLOSURE

1. Annual Notice

Every interested person shall annually review a copy of the most current Conflict of Interest Policy of CISV International and sign a statement which states that person:

- a. Has received a copy of the Conflict of Interest Policy,
- b. has read and understands the policy,
- c. has agreed to comply with the policy, and

- d. understands the organization as a charity must engage primarily in activities which accomplish one or more of its charitable purposes to keep that status.

2. Disclosure Statement

Every interested person shall review and execute the organization's CONFLICT OF INTEREST DISCLOSURE STATEMENT. This disclosure statement must be re-executed annually regardless of whether or not there are any additional relationships or matters to disclose. CISV International will keep this written record of any actual or potential conflicts of interest.

EXTERNAL REPORTING

It is a legal requirement for CISV International to declare financial benefits received by trustees in their report and annual accounts. If an interested person receives any financial benefit other than expenses for attendance at meetings, it is important to explain to the Charity Commission why such payment was lawful and how the charity has dealt with the Conflict of Interest on the annual submission of the accounts or return to the Commission.

DATA PROTECTION

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018.

AMENDMENT

This policy may be amended only by a majority vote of the Board at a regular or special meeting of the Board. In the event that the policy is amended, all interested persons shall be provided with a copy of the amended policy.

This policy was approved by the CISV International Board at the Annual International Meeting 2013.

Date Adopted: 9 August 2013

**CISV International
Conflict of Interest Disclosure Statement**

I, _____, certify that I have read and understand the Conflict of Interest Policy of CISV International and I agree to comply with it, as well as applicable laws that impact the organization, at all times. I understand that CISV International, as a charity, must engage primarily in activities which accomplish one or more of its charitable purposes to keep that status. I affirm that, except as listed below, I have no personal, business or financial interest that conflicts, or appears to conflict, with the best interests of CISV International. I agree to discuss any conflicts listed below with the Board Chair or the Secretary General of CISV International and to refrain from participating in any discussions, deliberations, decisions and/or voting related to the matter presenting the conflict until such time as it is determined by CISV International that the conflict is mitigated or otherwise resolved.

Describe any potential conflicts:

At any time during the term of my affiliation with CISV International, should an actual or potential conflict of interest arise between my personal, business or financial interests and the interests of CISV International, I agree to: (1) disclose promptly the actual or potential conflict to the Board Chair or the Secretary General of CISV International and (2) until CISV International approves actions to mitigate or otherwise resolve the conflict, refrain from participating in any discussions, deliberations, decisions and/or voting related to the conflict of interest.

Signature: _____ Date: _____

Print Name: _____