



Sunrise Children's Association Incorporated

Conflict of Interest Policy

This Conflict of Interest (COI) Policy was ratified by the Managing Committee on 16th June 2009.

Purpose

This COI Policy sets out Sunrise Children's Association Incorporated's (SCAI) policy for managing actual, potential or perceived conflicts of interest for members of the Managing Committee, individual Office Holders and/or independent providers of advice or services to SCAI.

There are many situations which may involve a conflict of interest. This document does not attempt to be prescriptive or to prohibit certain activities; but rather it provides a guide to recognising conflicts and determining appropriate disclosure and other responses.

Definitions

A conflict of interest exists where there is a divergence between the individual interests of a person and their professional obligation to SCAI such that an independent observer might reasonably question whether the professional actions or decisions of that person are influenced by their own interests.

Procedure

- All people to whom this Policy applies have an obligation to consider the potential for conflicts of interest in any decisions which impact upon SCAI or the operations of Sunrise Orphanage or other partners.
- If an actual or perceived conflict of interest arises, or a reasonable person would assume a conflict of interest could be perceived, then the person has an obligation to disclose the situation or relationship giving rise to the conflict.
- The disclosure should be to the President, in the first instance, or to the Managing Committee as a group if that forum is the more appropriate for disclosure.
- The President and Managing Committee shall then assess the severity of the actual or perceived conflict of interest and determine appropriate actions to mitigate the risk to SCAI, Sunrise Orphanage or other partners.
- Such actions may include the conflicted party standing aside from certain actions or decisions if appropriate.
- All formal decisions of the Managing Committee, especially those involving the potential for conflict of interest, shall include consideration of the COI Policy requirements.
- Agenda and Minutes of the Managing Committee shall reflect consideration of conflicts of interest, any disclosures and actions determined.
- The Conflict of Interest Policy shall be available to members of SCAI and the public via the website.
- Responsibility for monitoring for compliance with the COI Policy resides with the Managing Committee and individual Office Holders

Discussion

The Managing Committee has determined that the practical impact of conflict of interest risks on SCAI is minimized by the following factors:

- All work undertaken by Managing Committee, Office Holders and President for SCAI & project partners in Nepal is provided on a volunteer basis; and
- All providers of other services – accounting/bookkeeping, external audit, independent advisors and legal advisors – give their time on a pro-bono basis.