

CERP

Conflict of Interest Policy

Conflict of interest

CERP staff are often required to make decisions on behalf of or as agents of the organization. For this reason, they must ensure that their private interests do not adversely impact their ability to undertake their official duties responsibly. They must not put themselves in a position where their actions can reasonably be perceived to be of improper influence. Any conflicts of interest (both existing and potential) should be declared, and individuals should further excuse themselves from any decision where a conflict of interest could exist.

1. Occurrence

A conflict of interest (COI) arises where an employee has a private or personal interest which may or could be perceived to compromise their ability to do their job. Actual, potential (could develop) or perceived (could be considered likely). COIs can arise across all areas of work. Examples include, but are not limited to:

- a. Personal: CERP recognizes that individuals will develop relationships, friendships and contacts in their personal and working lives that may influence their objectivity. Most 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 and in the event where this can attract perceptions of bias and unfair treatment.
- b. Financial: A financial COI may arise where it could be perceived that a member of the organization (or someone who has a personal relationship with a member) has:
 - i. The opportunity to gain financially, prevent someone from gaining financially or placing that individual at a disadvantage from their decisions or actions;
 - ii. Financial interests which may influence their independent judgment and integrity in carrying out their role;
 - iii. The opportunity to gain from the award of a particular contract for goods or services.
- c. Political: Members of the organization take part in political or public activities which compromise or might be seen to compromise their impartiality and allow their personal or political views to determine any advice they give or their actions.
- d. Others: The above examples are not exhaustive since relationships and circumstances can vary considerably.

1. Deciding whether there is a COI

In deciding whether a COI exists, an individual should consider whether the interest (private or personal) is likely to or could appear to interfere with their, or another individual's, objective judgment when undertaking their duties. Direct supervisors or CERP Core Management can be consulted to discuss the matter.

2. Reporting Process

- a. Declarations must be made to the Operations manager through email and the individual making the declaration must take no further part in the situation until the matter has been cleared.
- b. Individual members of staff are responsible for ensuring that their declarations are always kept up to date. Failure to declare a COI will result in a disciplinary enquiry by the CERP Board's Ethics Committee and reporting criminal offenses to the relevant authorities.
- c. Operations will create and maintain a log of all declarations, noting the date of receipt of emails.
- d. Declarations will be reviewed within 10 working days, and where necessary, any mitigating actions will be implemented. The following classifications of a COI exist:

- i. There is no COI
 - ii. A COI exists but to continue with the activity and implement actions to mitigate any risk, which could include closer monitoring, revisions to plans, exclusion from decision making activities and disclosures of all relevant information to others involved in the process.
 - iii. A COI exists and has compromised an activity, which needs to be restructured or aborted and disciplinary and legal action needs to be taken if warranted by investigation.
- e. All declarations will be presented to the CERP Board's Ethics Committee, where all mitigating actions must also be discussed and approved. The frequency of declarations made by staff who have accepted gifts and hospitality will be monitored.

Employee makes declaration	Operations	Ethics Committee
<p>Email sent to Operations@cerp.org.pk</p> <p>The individual must take no further part in the situation until the matter has been cleared.</p> <p>Employees must ensure that their declarations are up to date.</p>	<p>Create and maintain a log of all declarations, noting the date of receipt of emails.</p> <p>Declarations will be reviewed and classified within 10 working days as:</p> <ul style="list-style-type: none"> - No COI - COI exists but to continue with the activity and mitigate risk - COI exists and has compromised an activity 	<p>All declarations will be presented here</p> <p>All mitigating actions must also be discussed and approved.</p> <p>The frequency of declarations made by staff who have accepted gifts and hospitality will be monitored.</p> <p>Individuals who have not declared a COI will face a disciplinary enquiry by the Ethics Committee</p>

Nepotism

Employees cannot directly supervise, report to, or be able to influence the recruiting, work assignments, evaluations, or expense approval of an individual with whom they have a romantic or familial relationship. Further, CERP prohibits employees who have a romantic or familial relationship from working on the same Project/Program, or within the same functional area.

Gifts and Hospitality

Gifts and hospitality should never be accepted with the intention to influence- or appear to influence- business decisions or relationships in any way. The only exceptions are those which would be considered isolated trivial gifts i.e. low value items that are valued below Pakistani Rupees 500.

Items that may be considered under this policy include:

- a. Corporate branded items
- b. Cultural courtesies
- c. Business gifts
- d. Travel or accommodation associated with a conference, meeting or event
- e. Business meals and refreshments
- f. Tickets to sports, music or cultural events

Reporting Process

To maintain public confidence and protect the integrity of both CERP and its team members, it is important for all members of the organization to register a declaration of all gifts and hospitality (accepted or declined) in order to remove any question of improper conduct and drive transparency with the organization.

Employees declare gifts/hospitality to Operations through email (Operations@cerp.org.pk)

- Staff members must ensure their declarations are kept up to date at all times with Operations
- Failure to declare the offer of a gift or hospitality will result in a disciplinary enquiry by Ethics Committee and reporting of criminal offenses to the relevant authorities

Operations

- Operations will create and maintain a log of all declarations, noting the date of receipt of emails.
- Declarations will be reviewed within 10 working days
- Where necessary, any mitigating actions will be implemented

CERP Ethics Committee

- All declarations need to be presented to the CERP Board's Ethics Committee,
- All mitigating actions must also be discussed and approved.
- The frequency of declarations made by staff who have accepted gifts and hospitality will be monitored.

Activities outside of CERP

While serving as a full-time employee of CERP, employees will not undertake any paid job/assignment outside of CERP. This includes monetary compensation from any voluntary work that is done outside of the organization. Responsibilities to the organization should be given precedence to any external voluntary activities.