



# Conflict of Interest Policy

*Version 2.0*

**Approved by: The Board of Trustees**  
**Prepared: September 2023**  
**Next Review: September 2025**



## 1. Introduction

The establishment of a Conflict of Interest (COI) policy at The Safa Education Welfare and Charitable Trust (TSEWCT) is essential to ensure transparency, fairness, and integrity across all of its operations and uphold public interest. The COI policy seeks to prevent situations where personal, financial or relational interests may compromise the integrity of decisions and actions taken by individuals within the organisation. By implementing this COI policy, TSEWCT demonstrates its commitment to ethical standards and responsible governance, aligned with its mission and values.

### 1.1 Definitions

- **Conflict of Interest (COI):** A situation in which an individual's personal or financial, professional interests could compromise their objectivity, judgement, or actions in carrying out and fulfilling their duties at TSEWCT. Conflicts may arise directly or indirectly and can potentially impact the individual's responsibility to act in the organisation's best interests
- **Interested Party:** Any individual associated (employees, board members, consultant and affiliates as well as family members, familial, friends and other close relations who may have a personal, financial, or professional interest that could potentially influence and create a conflict of interests in their actions or decision at TSEWCT.

## 2. Purpose

The primary purpose of the COI policy is to identify, disclose, and manage potential conflicts of interest that may arise during the course of TSEWCT's operations. The policy aims to:

- Safeguard the organisation's integrity and public trust by ensuring decisions are made impartially and in the best interest of TSEWCT mission.
- Provide a clear and safe mechanism for disclosing potential conflicts of interest with a commitment to confidentiality and protection for those disclosing in good faith.
- Establish procedures to assess, mitigate or resolve conflicts of interest, protecting the organisation from risks such as bias, unethical behaviour or reputational harm.
- Promote accountability and uphold ethical standards among staff beneficiaries and stakeholders, fostering a culture of trust and transparency within the organisation.

## 3. Scope

The COI policy applies to:



- All individuals, employees, board members, consultants, volunteers and external partners, especially those who have decision-making authority or influence within TSEWCT's operations not limited to partnerships, grants and collaborations.
- Situations where personal, financial, familial interests may directly or indirectly conflict with the TSEWCT mission and objectives.
- Key activities involving procurement, hiring, vendor selection, grant approvals, and financial transactions as well as other areas where personal interest might impact TSEWCT operations.
- Relationships and situations that may give rise to perceived or actual conflicts of interest in the organisation's decision-making processes.

#### **4. Committee Formation / Roles and Responsibilities:**

Establish a Conflict of Interest Committee (COIC) to oversee the implementation of the COI policy and address any potential conflicts within the organisation. The COIC will consist of senior representatives from TSEWCT, with legal, financial, and operational experts as well as external members to ensure fair and unbiased evaluations. The committee ensures that all conflicts are managed transparently and ethically.

**4.1 Committee Composition of COIC Members:** The members of the committee will involve non-executive members of the board/trustees for a fair and unbiased evaluation of potential conflicts of interest, ensuring that decisions are made transparently and in the best interest of the organisation.

The committee will include;

- One internal member who is a trustee of TSEWCT
- Two external members will involve non-executive members of the board/trustees from the group's other registered organisations (Safa Care Foundation and Safa Baitul Maal Religious and Welfare Trust) for a fair and unbiased evaluation of potential conflicts of interest, ensuring that decisions are made transparently and in the best interest of the organisation.
- All committee members will have equal voting rights and a majority decision will be required to resolve conflicts

#### **5. Roles and Responsibilities:**

##### **5.1 Monitoring and Oversight:**

- The committee is responsible for monitoring potential conflicts of interest within the organisation and ensuring that policies are effectively implemented and followed.



- Members will regularly audit and review relevant activities and transactions to identify any situations that may lead to conflicts.

### **5.2 Evaluation and Reporting:**

- The committee will evaluate disclosures of potential conflicts of interest submitted by staff and board members, providing objective assessments of the situations.
- Members will compile and present reports on the committee's findings and recommendations to the organisation's leadership for informed decision-making.

### **5.3 Guidance and Training:**

- The committee will provide guidance and training on conflict of interest policies to all staff and stakeholders, ensuring a comprehensive understanding of the guidelines.
- External members will leverage their expertise and experience to offer insights on best practices and ethical standards.

### **5.4 Decision-Making Support:**

- The committee will assist in making decisions regarding the management of identified conflicts, including implementing necessary actions or adjustments to mitigate risks.
- By including external members, the committee enhances its impartiality and credibility in addressing conflicts.

### **5.5 Facilitation of Transparency:**

- The committee will ensure transparency in its operations by documenting meetings, decisions, and actions taken in response to potential conflicts.
- Members will promote an open culture where individuals feel comfortable disclosing conflicts without fear of repercussions.

## **6. Regular Training for COIC Members and Staff**

- **COIC Members** : Participate in training to effectively recognize and address conflicts of interest.
- **External Experts**: Attend refresher courses to stay updated on evolving laws and ethical standards.
- **Staff Training**: All staff and volunteers will receive training on how to recognize, disclose, and handle conflicts of interest.
- [Acknowledgement Form](#) (Annexure - I)

## **7. Disclosure and Reporting Mechanism**

A standardised disclosure form (Annexure-II attached at the end of this policy) will be used for reporting potential conflicts of interest. The organisation will provide mechanisms for



confidential disclosures to encourage transparency. The reporting system should ensure privacy and confidentiality throughout the process.

## **8. Investigations and Resolution**

The COIC is responsible for investigating reported conflicts of interest in a fair, impartial, and confidential manner. The investigation process includes:

- Collecting relevant information and conducting interviews if necessary.
- Analysing the situation to determine if a conflict exists and its potential impact.
- Recommending solutions, such as recusal from decisions, termination of conflicting relationships, or other appropriate actions.

## **9. Resolution and Redressal**

After reviewing potential conflicts, the COIC will recommend actions to resolve the issue.

These may include:

- Recusal of individuals from decision-making processes.
- Adjustments to organisational policies or procedures.
- Termination of contracts or relationships posing a conflict of interest.
- Failure to disclose a conflict of interest may result in disciplinary action, including termination or suspension.

## **10. Confidentiality**

All COI investigations and disclosures must be handled with strict confidentiality. Information must be safeguarded and shared only with authorised personnel to protect the privacy of all involved parties.

## **11. Review and Updates**

This policy will be reviewed biennially or as needed to reflect organizational or legal changes.



**ANNEXURE-I**  
**TSEWCT - Conflict of Interest Acknowledgement Form**  
**(To be signed by all staff, contractors, and volunteers)**

**Date:** \_\_\_\_\_

**Participant Name:** \_\_\_\_\_

**Position/Role:** \_\_\_\_\_

I, \_\_\_\_\_, hereby acknowledge the following:

- I have received and/or have access to the organization's Conflict of Interest (COI) policy.
- I understand the importance of disclosing any potential COIs and adhering to the organization's guidelines to maintain ethical standards.

**Key Points of the COI Policy:**

- **Definition of COI:** A COI exists when my personal or financial interests could potentially influence my judgment or actions in my role with the organization.
- **Disclosure Requirements:** I am obligated to disclose any potential COIs to the appropriate authority within the organization.
- **Resolution Process:** The organization has procedures in place to address and manage any identified COIs.
- **Consequences of Non-Disclosure:** Failure to disclose potential COIs may result in disciplinary action.

**By signing this form, I confirm the following:**

- I have read and understood the COI information provided.
- I agree to comply with the organization's COI policies.
- I will complete the Conflict of Interest Disclosure Form if I identify a potential COI.

This acknowledgment remains valid until my next annual review or any changes to my role or circumstances requiring a new declaration.

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

For digital submissions, ensure your signature complies with the organization's policy and is submitted through approved platforms such as DocuSign.



## ANNEXURE-II

### CONFLICT OF INTEREST FORM

The Safa Education Welfare and Charitable Trust (TSEWCT)

Appendix A: Conflict of Interest Disclosure Form for TSEWCT

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

Description of Conflict of Interest:

Please provide a detailed description of the conflict of interest, including the individuals or parties involved, the nature of the conflict, and how it may impact your role within the organisation.

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Actions Taken or Proposed:

Outline any actions you have taken or propose to take to address the conflict of interest and ensure that it does not compromise your objectivity, judgement, or decision-making within the organisation.

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Declaration:



I hereby confirm that the information provided in this form is true and complete to the best of my knowledge. I understand the importance of disclosing conflicts of interest and the organisation's commitment to managing such conflicts in a transparent and ethical manner.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

[For Official Use]

Assessment Outcome:

Conflict of interest is minor and does not require further action.

Conflict of interest is moderate and requires [actions recommended].

Conflict of interest is significant and requires referral to [Ethics Committee / Board of Directors].

Actions Taken:

Allowed to participate in decision-making.

Recused from discussions and decisions related to the conflicted matter.

Other: \_\_\_\_\_

Signature of Designated Person: \_\_\_\_\_

Date: \_\_\_\_\_

NOTE: This form will be kept on file in a confidential manner.