



CONFLICT OF INTEREST POLICY (STAFF) (KKCSP-003(A))

1. Definitions

- 1.1 “Organisation” refers to Kampong Kapor Community Services.
- 1.2 “Staff” refers to permanent staff, part-time staff and contract staff.
- 1.3 “Policy” refers to the Conflict of Interest Policy.
- 1.4 “Interest” means any commitment, investment, relationship, obligation, or involvement, financial or otherwise that may influence a person’s judgement. This would include:
 - a. Direct interest – ownership in the name of the staff;
 - b. Indirect interest – ownership beneficially held through another investment, estate, trust or other intermediary;
 - c. Vested interest – personal stake or involvement, which may or may not include an expectation of financial gain; and
 - d. Deemed interest – a staff is deemed to have an interest which his/her spouse holds an interest.
- 1.5 A conflict of interest arises when the personal interests of the staff may potentially interfere with the performance of his/her duties in the Organisation. When actual, potential or perceived conflict of interest arises, the integrity, fairness and accountability of the person may be affected, which could impede the best interest of the organisation.

2. Purpose

- 2.1 Kampong Kapor Community Services as a responsible and accountable social service organisation, has an obligation to avoid situations where there may be real, potential or perceived conflicts of interest, which may arise where staff’s personal or family interest conflicts with those of the Organisation.
- 2.2 Such conflicts may create problems that may result in the following:
 - a. Cause damage to the Organisation’s reputation which may lead to its inability to sustain operations;
 - b. Influence the staff’s judgment and compromise objectivity when conducting the Organisation’s affairs;

- c. Restrict free discussion, thus resulting in decisions or actions that are not in the interests of the Organisation; and
- d. Risk the impression that the Organisation has acted improperly.

2.3 This Policy aims to protect both the organisation and its staff from any appearance of impropriety.

3. Declaration of Interests

3.1 Given the stated purpose of this Policy, we require staff to declare

- a. their interests, and any gifts or hospitality received in connection with their role in the Organisation; and
- b. when the transaction effected may result in a conflict of interest.

3.2 A declaration of interest form is provided for this purpose (Annex A). The types of interest to be declared will include, but not limited to the following:

- a. Staff who have friends or other personal or business relationships must carefully consider whether those relationships create conflicts of interest with their entrusted role in the Organisation. Examples include:
 - i. hiring a relative or friend as an employee or vendor;
 - ii. buying or selling goods or services from/to a family business for which others might compete;
 - iii. having a personal relationship where there is an immediate reporting relationship;
 - iv. volunteering and/or having memberships in any other charities; or
 - v. receiving goods/services from beneficiaries.
- b. Staff must declare and disclose any outside activities, financial interest or relationship that may pose a real, potential or perceived conflict of interest.

3.3 To be effective, the declaration of interests needs to be updated in written form at least annually and when any changes occur.

3.4 In situations where Staff are not sure what to declare, or whether/when the declaration needs to be updated, they are strongly encouraged to err on the side of caution or seek advice from the Executive Director.

3.5 All disclosure of interest made by staff and the decisions made by the Executive Director on such matters must be recorded, updated and filed with the Corporate Office.

4. Operating Procedures

4.1 It is the responsibility of the staff to:

- a. Identify the potential conflict of interest;
 - b. Not participate in discussion of the program being considered.
 - c. Follow existing procurement policy and processes.
 - d. Document and adhere to the procedures and criteria of this policy in event of conflict of interest.
- 4.2 It is the responsibility of any staff to report any possible real, potential or perceived conflict of interest. If it is due to an oversight, the staff concerned shall promptly inform the Organisation that he has been put in such a position of conflict of interest.
- 4.3 Any staff shall refrain from obtaining any list of service users or staff or members for personal or private solicitation purposes at any time during the term of their employment.
- 4.4 Any staff who is also a user of the Organisation’s services, or the carer of someone who uses the Organisation’s services shall not be involved in decisions that directly affect the service received by the person he/she cares for. He/she shall declare his/her interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if the conflict concerns any other reason(s).
- 4.5 A staff may, however, participate in discussions from which he/she may indirectly benefit, for example where the benefits are universal to all users.
- 4.6 The Management Committee /Executive Director shall have the right to suspend any involvement of any staff when it has come to their attention that a potential actual or perceived conflict has arose but has not been voluntarily disclosed by the relevant staff.

5. Violations

- 5.1 Any violation will result in discipline, up to and including termination from employment.

CONFLICT OF INTEREST (STAFF)	Policy No.:	KKCSP-003(A)
Approved by: Management Committee	Version:	01
	Dated:	14 March 2019
Note: This policy pulls together policies and guidelines from existing documents.		



Kampong Kapor Community Services

Affiliated to Kampong Kapor Methodist Church

DECLARATION OF CONFLICT OF INTEREST DISCLOSURE FORM

I declare that, as of this date (tick on the box that applies to you most):

- I do not have any potential or actual conflict of interest existing between me and the Organisation.
- I have the following potential or actual conflict of interest with (Please elaborate and attach a separate sheet if space provided is insufficient):

I hereby confirm that the disclosures made are complete and correct to the best of my knowledge and belief. I agree that should any conflict of interest situation arise in the course of my service, I will declare such a conflict immediately to the organisation.

Name

Signature

Designation

Date