POLICY ON CONFLICT OF INTEREST

June 2025

GPE Transforming Education

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PREAMBLE

The Global Partnership for Education (GPE) works to accelerate the Education for All goals. Membership in the Global Partnership for Education is based on a compact as described in the *Charter of the Global Partnership for Education*. As stated in the *Charter*:

> *In subscribing to the GPE Compact, partners are called to give careful attention to aid effectiveness and to promote transparency, clarity, and trust. The Global Partnership for Education relies on a clear and effective structure of governance and decision-making processes intended to take decisions in the best interests of GPE intended to help achieve GPE Strategic Plans. Broad participation by all partners, including developing country partners, donors, multilateral organizations, non-governmental organizations (including international and local CSOs), members of the teaching profession and the private sector and private foundations is essential and the relationships and communications among these partners are built on clarity and transparency. Steps are taken to minimize possible conflicts of interest and manage them, where applicable, through the Policy on Conflicts ofInterest approved by the Board of Directors. Adaptability is a key characteristic of the Global Partnership for Education.*

The Global Partnership for Education recognizes that to fulfill its goals, there is a need to involve many interested stakeholders in the Partnership, including donor countries, developing country partners, civil society organizations, the private sector and private foundations and multilateral agencies. Each of these stakeholders has unique perspectives and expertise to contribute to the Global Partnership and is therefore represented in its governance structures.

GPE recognizes that the constituency-based nature of its governance structures may result in conflicts of interest when the Board of Directors and the Committees that it establishes must consider matters that have a direct effect on the interests of governments, corporations, or organizations that are Partners. GPE recognizes that these conflicting interests must be identified early and that actualor potential conflicts need to be disclosed and managed with the highest degree of integrity to safeguard against any perception that participation by a particular person, government, corporationor organization in GPE confers an undue advantage for such person or entity in the Global Partnership for Education's decisions.

Due to the diversity of interests and perspectives represented by these stakeholders, it is therefore important that GPE operates in a balanced, ethical, collaborative,

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transparent and open manner.

GPE recognizes that many of its stakeholders, including the Secretariat, are subject to the conflict-of-interest provisions of their employment agreements. GPE expects that those conflict-of-interest provisions will continue to be adhered to by all stakeholders participating in the work of GPE. Whenever possible, this policy shall be interpreted to be consistent with the laws, regulations and other policies applicable to GPE Persons.

PURPOSE

The purpose of this policy is to increase the objectivity of GPE's decision-making by identification anddisclosure of potential and actual conflicts of interest and to manage such conflicts in transparent ways. Transparent and objective decision-making will help to protect the reputation and integrity ofGPE and to promote broad public trust in GPE's activities.

1. CONFLICTS OF INTEREST

1.1 For the purposes of this policy, a **conflict of interest** arises when the ability of a person participating in a Decision-Making Process (defined below) to exercise judgment in the interest of the GPE as a whole is impaired by the financial interests of a Partner that he or she represents or hisor her personal financial interests, including those of his or her family members.

1.2 Distinction should be made between potential and actual conflicts of interest. A conflict of interest is *potential* when the person has a conflict of interest with regard to a certain exercise of hisor her judgment, but is not yet in a situation where he or she must make that judgment. A conflict ofinterest is *actual* when the person has a conflict of interest with regards to a certain exercise of his orher judgment and is already in a situation where he or she must make that judgment.

2. APPLICATION OF THE POLICY

2.1 This policy applies to the following persons (individually, a **"GPE Person"**) when they participate in a **Decision-Making Process**:

- Board Members and Alternate Board Members.
- Members of Committees that the Board of Directors may establish.

2.2 A **Decision-Making Process** is a meeting or other discussion of the Board of

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Directors or one of its Committees, whether in-person or by electronic or other means, regarding a significant policy decision or the award, cancellation or reduction of a financial allocation from the Global Partnership for Education's trust funds.

2.3 GPE Secretariat staff are subject to conflict-of-interest provisions of the World Bank as host of the GPE Secretariat. With regard to the delegation of GPE grant approvals to the GPE Secretariat CEO in the context of grant allocations to the World Bank as a GPE Grant Agent and the related perceived conflict of interest, it is noted that the Memorandum of Understanding between the World Bank and GPE on the hosting arrangements (accepted by the Board in decision BOD/2018/12-01) includes provisions that sufficiently mitigate any such associated risk in sections 3(b), 6(c), 9(b) and 10.

3. PRINCIPLES FOR MANAGEMENT OF CONFLICTS OF INTEREST

3.1 GPE shall execute **Decision-Making Processes** in an open and transparent manner.

3.2 It is recognized that **GPE Persons** participate in **Decision-Making Processes** in the interests of the governments, corporations or organizations in their respective constituencies. When they do so, they shall comply with the rules and procedures of GPE, as set out in the Charter of the Global Partnership for Education and this Policy. When taking such actions, a **GPE Person** shall not attempt to exert improper influence with respect to a **Decision-Making Process**.

3.3 As a general principle, a **GPE Person** participating in a **Decision-Making Process** shall be mindful of the existence of his or her potential and/or actual conflicts of interest and shall disclose them in advance of his or her participation:

a. To the Chair of the Executive Committee (EXCO) for a **Decision-Making Process** not involving a funding proposal; and

b. In compliance with paragraph 3.4 below for a **Decision-Making Process** involving a funding proposal.

After disclosing a conflict of interest outside of a **Decision-Making Process** involving a funding proposal, the **GPE Person** shall recuse him or herself from the decision-making process, unless EXCO decides that such recusal is unnecessary. EXCO may determine that a **GPE Person** with an actual or potential conflict of interest may participate in a **Decision-Making Process** conditional on a reduced level of participation (for example, presentation of technical information without any recommendations).

3.4 In particular, for a **Decision-Making Process** with respect to a funding proposal, the following provisions shall apply:

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a. A **GPE Person** with a potential or actual conflict of interest with respect to the funding proposal shall disclose the existence of such conflict of interest to the Chair of the meeting where the funding proposal is being discussed in advance of participation in the discussion.

b. There shall be a presumption that a **GPE Person** representing a country, organization or agency: (i) that is nominated to be the Grant Agent; or (ii) that is the Developing Country Partner or other organization that will receive a grant from the approved allocation, has a conflict of interest and is obligated to make a disclosure.

c. Upon being notified of the conflict of interest, the Chair shall determine the appropriate limits, if any, that shall be placed on the conflicted person's involvement in the discussion.

d. In the event that a **GPE Person** with an actual conflict of interest (including a person with respect to whom there is a presumption of a conflict of interest as described in paragraph b above) does not disclose his or her conflict of interest, the Chair of the meeting shall approach the relevant **GPE Person** and request his or her recusal.

e. In no case shall a **GPE Person** who has an actual conflict of interest in regard to a funding proposal participate in a vote awarding, reducing or cancelling the funding for such proposal.

3.5 When a **GPE Person** representing their constituency discloses his or her conflict of interest, he or she may request that another member of the constituency participate in the Decision-Making Process. In such cases, the person with a conflict of interest shall not be involved in the constituency consultation process.

3.6 In no case shall a **GPE Person** receive or accept anything of value that can be reasonably perceived to impair his or her judgment in a **Decision-Making Process**.

3.7 The hiring, or secondment of, a **GPE Person** to the Secretariat shall be subject to the policies and procedures of the World Bank on appointments and secondments. In addition, a **GPE Person** shall not be eligible for appointment or secondment to the Secretariat until one year following their last date of service in such position. EXCO may waive this provision based on a risk assessment.

3.8 In order to enhance enforcement of this Policy, any person who has reasonable cause to believe that a **GPE Person** has failed to disclose a conflict of interest before participating in a **Decision-Making Process** or has otherwise violated this policy shall notify the Chair of the EXCO. EXCO shall provide the affected **GPE Person** (and, where

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applicable, the Chair of the Board of Directors and/or the chair of the relevant committee where the violation has occurred) the opportunity to respond. After receiving such response, EXCO shall discuss its resolution, including possible sanctions, or review of the decision, and present, where appropriate, a recommendation for a decision by the Board of Directors.

4. ACKNOWLEDGMENT OF THE CONFLICT-OF-INTEREST POLICY

Due to the sensitive nature of conflict of interests, Board members, Alternate Board members and allmembers of standing Committees are required to provide a written acknowledgment of this policy inthe form attached as Annex 1.

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ANNEX 1: CONFLICTS OF INTEREST POLICY ACKNOWLEDGMENT

1. I have received, read and understood the Policy on Conflict of Interest, approved by the Boardof Directors of the Global Partnership in Decision BOD/2011/11-6 and agree to comply with/abide fully by its terms and conditions at all times during my tenure as a Board member, Alternate Board member and/or a Committee member.
2. If at any time I become aware of any actual or potential conflicts of interest, I will promptlynotify:
    - The Chair of EXCO for a Decision-Making Process not involving a funding proposal.
    - The Chair of the meeting for a Decision-Making Process involving a funding proposal.

   I have noted that when I have disclosed my conflict of interest, I may request that another memberof the constituency category participate in the Decision-Making Process. In such case, I will not been involved in the constituency category consultation process.

NAME:
TITLE:
ORGANIZATION:
DATE:

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