

GLOBAL PARTNERSHIP *for* EDUCATION

POLICY ON CONFLICTS OF INTEREST

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For Decision

Approval of Policy on Conflicts of Interest

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Request Secretariat to develop Ethics Committee terms of reference

Background (1)

Madrid Board Meeting (November 2010)

Board of Directors constituency- based. Roles include:

- Making all policy decisions
- Making financial allocation decisions

Financial Advisory Committee established, also constituency-based. Role includes making recommendations to Board on financial policy and financial allocations

Background (2)

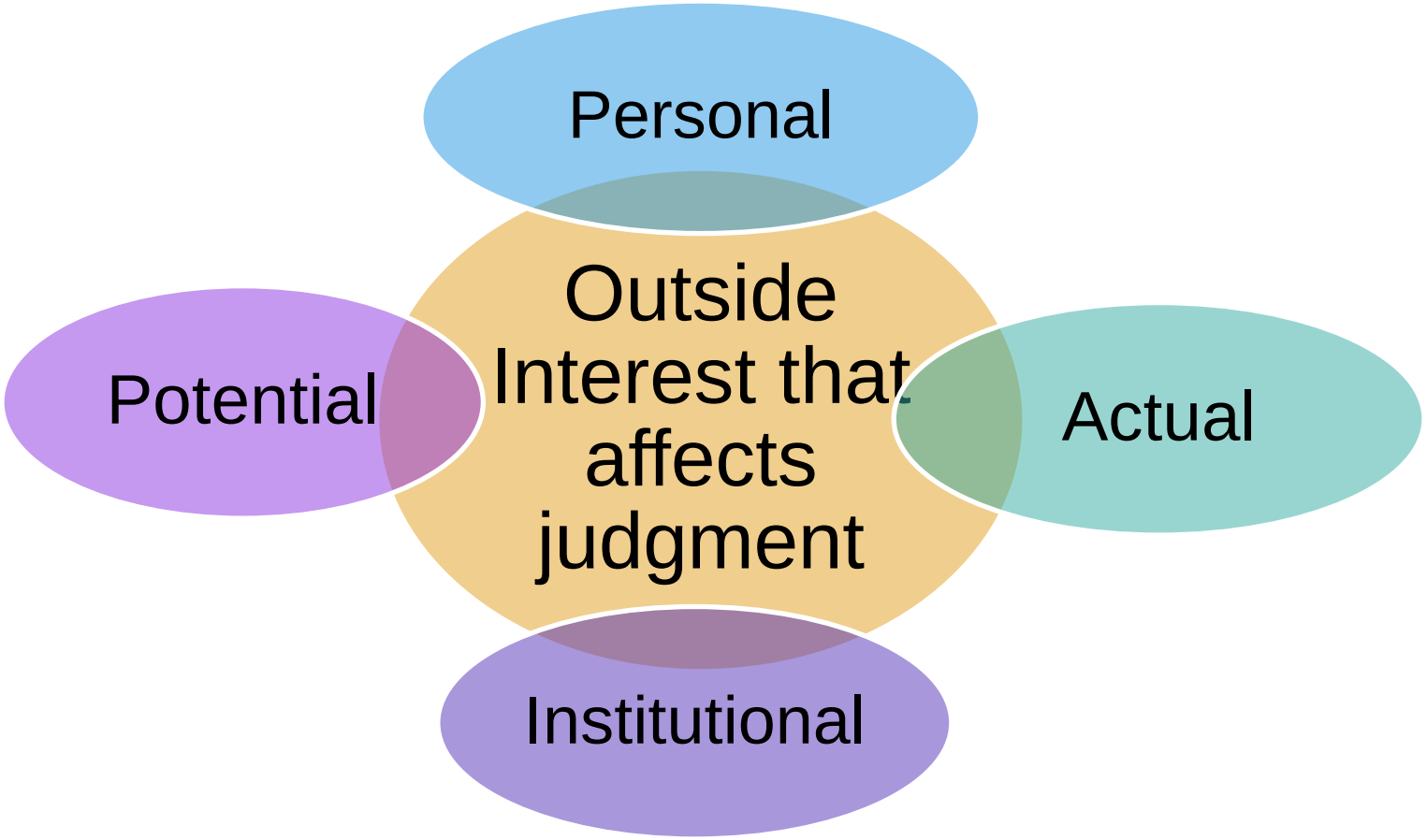
November 2010 (Madrid): BOD/2010/11-3 – Conflict of Interest Policy: Board requested Secretariat to develop a conflict of interest policy, based on accepted good practices of similar partnerships, for discussion and approval at the next Board

May 2011 (Kigali): Policy prepared, not presented

September 2011: Board written comments received

October 2011: revised paper distributed

Definition: Conflicting Interests (General)



Input from All Partners is Welcome!

BUT….Recognize that all partners have conflicting institutional interests

Institutional priorities may differ from those of the Global Partnership

Consider: What “hat” are you wearing?

Policy:
Definition of Conflict of Interest

A **conflict of interest** arises when:
the ability of a person participating in a Decision-Making Process
to exercise judgment
in the interest of the Global Partnership as a whole
is impaired by:

- the financial interests of a Partner that he or she represents or
- his or her personal financial interests, including those of his or her family members.

Policy: Application

GPE Person:

- Board Member/Alternate Board Member
- Committee Member

Decision-Making Process:

- meeting of Board or Committee (face to face, tele-conference)
- discussion of major policy decision or financial allocation

NB: Does not apply to Secretariat or Chair as only facilitate decision-making

General Guidance: Disclosure and Recusal



✔Be mindful of your own potential financial conflicts of interest before participating in a **Decision-Making Process**

➔ If you think you have a conflict, or are presumed to have one,disclose and recuse yourself

Who Do You Disclose and Recuse to?

Financial allocation decisions (award, cancellation, modification) (presumed conflict: Supervising Entity/Implementer and beneficiary country)

→Board/Committee Chair

Non-financial allocation decision (but major policy decision)

→Ethics Committee

What happens after you disclose and recuse?

Recipient of the disclosure (Board/Committee chair or Ethics Committee) decides on limitations to participation (if any), e.g.:

- non-attendance
- Leave meeting
- Stay, but only answer questions, etc.

In all cases, a Board Member with an actual COI cannot vote on funding decision

Constituency Representation

If constituency representative is conflicted, another person may speak on behalf of the constituency

Conflicted person (institution) should not be consulted in developing the constituency's position on the matter

Gifts



GPE Person may not accept anything of value that could be perceived to influence your input in a **Decision-Making Process**

Secondments



One-year “cooling off period” for appointments and secondments

Policy relies on self disclosure, but it is everyone's responsibility



So…if you think that a GPE Person has:

- Not disclosed/recused; or
- Otherwise violated the policy

→Raise with the Ethics Committee
→Ethics Committee will discuss with person, chair of Board/committee and recommend resolution to Board

Ethics Committee: Role

1. Receive conflicts of interest declarations outside of allocations
2. Determine participation in a Decision-Making Process
3. Determine whether to waive one-year “cooling off” period
4. Receive notifications of failure to disclose
5. Make recommendations to Board re possible sanctions or other resolutions.

Terms of Reference to be developed, including composition, selection of chair, membership, possible role expansion.

Requested Decision

BOD/2011/11-XX –Policy on Conflicts of Interest: The Board of Directors approves the Policy on Conflicts of Interest as set out in Annex 1 of BOD/2011/11 –DOC 09. The Board of Directors requests the Secretariat to deliver by 1 February 2012, draft terms of reference for the Ethics Committee, including its role and responsibilities, composition, and a process for selecting the membership and committee chair, for review and approval by the Board of Directors.

Next Steps

Addition to Board Manual

Place on website

Develop Ethics Committee terms of reference for Board approval

Establish Ethics Committee



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