

“Conflict of Interest Policy”

OF

NATIONAL DEVELOPMENT PROGRAMME

(NDP)

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NATIONAL DEVELOPMENT PROGRAMME

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NDP Bhaban, Bagbari, Sahidnagar, Kamarkhanda,
Sirajgonj, P.O Box-02, Bangladesh

Executive Director-Mobile: 01713-383100

Email:akhan_ndp@yahoo.com

Web: WWW.ndpbd.org

National Development Programme- NDP

Conflict of Interest Policy

1 Background:

The devastating flood at the end of 1988 engulfed large landscape of the country causing huge damage of lives and properties, which also badly affected to the lives of the peoples in Sirajganj district that situated on the bank of the most treacherous river Jamuna. The national and international NGOs came forward to provide succor to the victims of this deluge. A group of local youth including Md. Alauddin Khan, the chief executive of NDP now has voluntarily dedicated themselves in emergency response and rehabilitation works under the guidance of these NGOs. The experience they gained through it inspired them to take any sustainable development initiatives for the poor people. With this end in view, under the leadership of Md. Alauddin Khan, the "National Development Programme (NDP)" has established on 1st January 1992. It is a non-governmental organization, called as "NGO". By virtue of the constitution, it is a non-political and non-profit organization. The key objective of NDP is to *strengthen capacity of the targeted project participants (beneficiaries) and create scope for bringing them in the main stream of development*. Since its establishment, NDP has been paying efforts in view to changing livelihoods of the poor people it serves and committed to continue its work for their development as long as needed

1.2 Vision, Mission, Goal:

Vision:

Build a nation free of exploitation and poverty; ensure governance, equality, rights and a friendly environment for all.

Mission:

NDP work towards promoting poor people's access to services for better life & livelihoods through economic development and participation utilizing their potentials.

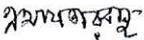
Goal:

Improve livelihoods and establish rights of the poor people thus contribute towards achieving National Developmental Goals.

1.3 Objective: The major objectives of NDP are to;

- ❖ Raise community awareness, capacity building and develop skill human resources
- ❖ Enhance poor people's participation and access to development opportunities
- ❖ Create employment opportunities and increase income of the poor peoples
- ❖ Empower and improve livelihoods and dignity of the poor peoples
- ❖ Reduce food insecurity and improve nutritional status of the extreme/ultra poor peoples
- ❖ Increase poor people's access to basic primary health care (PHC) and FP services
- ❖ Increase poor people's access to education and promote quality education
- ❖ Link people with special ability (PWD) with the main stream of development
- ❖ Develop poor people's resilience capacity to cope with disasters
- ❖ Promote bio-diversity conservation and renewable energy making the earth good for living
- ❖ Increase poor people's access to basic rights, entitlements, information and services
- ❖ Reduce violence against women and advocacy & legal supports to the distressed women
- ❖ Promote human rights, good governance and gender equality


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- ❖ Strengthen capacity of civil societies, CBO and UP in local level planning and management
- ❖ Ensure standard and extent quality services thus earns organizational sustainability

Purpose:

National Development Programme-NDP seeks to improve people's well-being through knowledge, innovation and transformative action. NDP is working to establish and promote a nation-wide network/coalition of NGOs and civil society to achieve Education for All (EFA). NDP'S mission is to promote an educated, creative, democratic, secular, humanitarian, equity based and poverty free Bangladesh.

The efforts and the accomplishment of the services and contribution by NDP must be seen to be just and transparent. The purpose of this policy is to ensure that the confidence entrusted by the members/partners, civil society, community members, clients, suppliers, vendors, donors and other stakeholders on NDP is protected and reinforced.

The objective of conducting conflict assessments is to improve the effectiveness of development policy and programmes in contributing to conflict prevention and reduction. Conflict assessments can be used to assess:

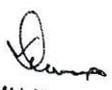
- (a) risks of negative effects of conflict on programmes;
- (b) risks of programmes or policies exacerbating conflict;
- (c) opportunities to improve the effectiveness of development interventions in contributing to conflict prevention and reduction.

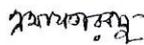
Who does it apply ?

This policy applies to all individuals and associates working at or with NDP, including but not limited to Board/Council Members, all employees (whether permanent, fixed/ short-term or temporary), casual workers, office volunteers and agency staff, member / partner organizations, donors, vendors/suppliers, agents, contractors or sub-contractors of NDP or any person associated with NDP wherever located. All will be provided with access to a copy of this policy.

Accessibility:

NDP is committed to ensuring that this policy is clear, practical, accessible and effectively implemented and enforced. Each person associated with NDP can access this policy. Hard copies will be made available upon request. If anybody requires any assistance or advice in reviewing or understanding any part of this policy, or if has any question or concern regarding the same and/or its implementation or enforcement, or any suggestion for improvement, s/he should contact NDP HR and Head of Accountant. All such communication will be treated as strictly confidential. Regular orientation on the policy will be offered to all interested / concerned individuals working with or for NDP. The purpose of such orientation is to ensure that each individual develops a clear understanding of the policy and procedures. Monitoring will take place by way of staff/stakeholder surveys, questionnaires and anonymous feedback from time to time.


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Definition:

Conflict of Interest: Conflict of interest is defined as an actual or perceived interest by an organization, staff or board member in an action that results in, or has the appearance of resulting in, personal or organizational gain.

Or

An employee, volunteer, including a board member (or a family member of the foregoing) is engaged in some capacity or has a material/financial interest in a business or enterprise that affects NDP in a negative manner.

Interested Person: An interested person is any person serving as an officer, employee or member of the Board/Council, or organization or anyone else who is in a position of control over entity or a person with whom transaction or contract is executed.

Material financial Interest: A material financial interest in an entity is a financial interest of any kind, which, in view of all the circumstances, is substantial enough that it would, or reasonably could, affect an Interested Person's or Family Member's judgment with respect to transactions to which the entity is a party.

Contract or Transaction: Any agreement or relationship involving the sale or purchase of goods or services, the providing or receipt of a loan or grant, the establishment of any other type of financial relationship, or the exercise of control over another organization.

Examples of conflicts of interest:

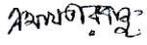
The following are some examples of conflicts of interest:

- (a) When an employee or family member has a connection to, or significant financial interest in, another party which does or seeks to do business with NDP.
- (b) When an employee engages in an independent business venture or works for another organization in a way that prevents the employee from devoting the time and effort to NDP required by his or her position.
- (c) When an employee diverts a business opportunity of NDP to another person or organization.
- (d) When an employee participates in an employment-related decision regarding a family member or other person with whom the employee has a close personal relationship.

NDP's Policy on Conflict of Interest:

1. Employees and Board/Council members and member NGOs are obligated to always act in the best interest of the organization. This obligation requires that any employee or member, in the performance of organizational duties, seek only the furtherance of the organization's mission. At all times, employees and board members are prohibited from using their job title or the organizations name or property, for personal / private profit or benefit.


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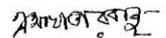
2. The employees, Board/Council members, affiliate and individual members of the organization should neither solicit nor accept favors or anything of monetary value from service provider/contractors/vendors. This is not intended to preclude bona-fide fund raising-activities.
3. Board/Council should not be comprised of immediate family members of the Executive Director or any other member of the staff. Immediate family members of the employees, Board/Council members - a spouse, parent, child, or sibling - or organizations or individuals with whom member(s) of Board/Council or their immediate family members are associated shall not be eligible for any assignments contracted out by NDP or any full time job in NDP.
4. NDP Board members should declare their involvement with other organizations to avoid any potential conflict of interest.
5. No employees, Board/Council members, affiliate and individual members of NDP shall participate in the selection, award, or administration of a purchase or contract with a vendor where, to his/her knowledge, any of the following are involved:
 - a) The employee or member;
 - b) Any member of their immediate family;
 - c) An organization in which any of the above is a board member or employee;
 - d) A person or organization with whom any of the above individual is negotiating or has an arrangement concerning prospective employment.
6. NDP strictly discourages receiving gifts from vendors or potential vendors or members or partner organizations except education and awareness raising materials (e.g. books, magazines, stationeries etc.), flower, souvenirs etc. However, any contribution or donation to NDP should not be considered as gift.
7. Any gift or donation to an employee, volunteer or board member the value of which exceeds the amount of USD50 should be disclosed in writing. In such case a gift register should be maintained.

Disclosure:

1. Any possible conflict of interest shall be disclosed by the person or persons concerned.
2. Prior to Board Meetings any contract or transaction involving a conflict of interest, an employee, Board/Council member having a conflict of interest and who is in attendance at the meeting shall disclose all facts / materials. Such disclosure shall be reflected in the minutes of the meeting.



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3. A person who has a conflict of interest with respect to a contract or transaction that will be voted on at a meeting shall not be counted in determining the presence of a quorum for purposes of the vote.
4. If a BoardMember, employee and volunteer believes that any relationships, positions or circumstances in which s/he is involved that he or she could contribute to a conflict of interest shall complete a disclosure form.
5. Memorandum of Understanding (MoU) between organizations, in which there are interested persons, shall be available to all concerned members, employees, clients and donors. The transactions between such organizations shall be documented and shall be governed by the policies of the organization utilizing the services of the other organization.
6. Should conflict of interest arise between personal or any other interests and that of NDP, then NDP shall disclose such conflict fully and transparently before the Board/Council, and in the interest of NDP shall accept any decision that may be taken by the Board/Council to resolve the same.

Procedure to manage conflicts:

When the conflict involves a decision maker, the person with the conflict (“interested party”):

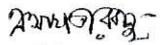
- (i) must fully disclose the conflict to all other decision makers;
- (ii) may not be involved in the decision of what action to take (e.g., may not participate in a vote)

but may serve as a resource to provide other decision –makers with necessary information.

The outcome of each of the cases of the conflict will be documented in the minutes and reported to the Executive Director (ED), if the conflict was related to a staff member.

The Executive Director (ED)/Authorized Person will monitor proposed or ongoing transactions of NDP (e.g., contracts with vendors and collaborations with third parties) for conflicts of interest and disclose them to the Board/council and staff, as appropriate, whether discovered before or after the transaction has occurred.


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