



ATPS

CONFLICT OF INTEREST

POLICY 2015

VERSION 3.0



Approved By:
Board of Directors



Effective Date:
January, 2015



Review Date:
January, 2024

PART I: PRELIMINARY PROVISIONS

1. SHORT TITLE AND CITATION

- 1.1 This Policy shall be cited as the African Technology Policy Studies Network (ATPS) Conflict of Interest Policy.
- 1.2 The African Technology Policy Studies Network (ATPS) is committed to the highest standards of integrity, accountability, transparency, impartiality, and ethical conduct in all its activities.
- 1.3 ATPS recognizes that actual, potential, or perceived conflicts of interest may arise in the conduct of governance, management, research, fundraising, procurement, partnership development, consultancy assignments, recruitment, grant management, and other organizational activities.
- 1.4 This Policy establishes principles and procedures for identifying, disclosing, managing, mitigating, and monitoring conflicts of interest to protect:
 - a) The independence and credibility of ATPS research;
 - b) The integrity of organizational decision-making;
 - c) Public trust and stakeholder confidence;
 - d) Compliance with donor and regulatory requirements;
 - e) Proper stewardship of organizational resources.
- 1.5 All persons covered by this Policy must place the interests of ATPS above personal, financial, professional, political, or family interests when acting on behalf of the organization.
- 1.6 This Policy establishes the institutional framework for the identification, disclosure, assessment, prevention, management, and resolution of conflicts of interest arising in the governance, administration, programme implementation, research, procurement, partnerships, and financial management activities of ATPS.

2. COMMENCEMENT

This Policy shall come into force on the date of approval by the Board of Directors and shall remain in force until amended, replaced, or repealed.

3. POLICY CONTEXT

3.1 ATPS is a pan-African knowledge institution dedicated to strengthening the capacity of African countries in science, technology, and innovation policy research, policy engagement, knowledge brokerage, institutional strengthening, and sustainable development programming.

3.2 In executing its mandate, ATPS engages with governments, academic institutions, research bodies, development partners, civil society organizations, private sector actors, consultants, and local communities across multiple African jurisdictions.

3.3 ATPS recognizes that these diverse institutional relationships may create circumstances in which personal, professional, financial, political, or institutional interests may conflict, or appear to conflict, with the best interests of the organization.

3.4 ATPS therefore adopts this Policy to safeguard organizational integrity, independence, impartiality, and accountability.

4. PURPOSE OF THE POLICY

4.1 The purpose of this Policy is to:

- (a) promote integrity, objectivity, and ethical conduct in all ATPS functions;
- (b) protect the credibility and independence of ATPS research and policy outputs;
- (c) prevent undue influence in governance and operational decision-making;
- (d) strengthen accountability in procurement, grants management, and partnerships;
- (e) ensure transparency in the management of institutional and personal interests;
- (f) protect ATPS from legal, fiduciary, reputational, and operational risks;
- (g) promote donor confidence and compliance with funding obligations.

5. OBJECTIVES

The objectives of this Policy are to:

- a) Establish clear standards for conflict disclosure;
- b) Provide mechanisms for managing actual, potential, and perceived conflicts;
- c) Ensure institutional decisions are made solely in the interests of ATPS;
- d) Strengthen public trust in ATPS governance systems;
- e) Protect the integrity of ATPS-funded and ATPS-led programmes.

PART II: SCOPE AND APPLICATION

6. APPLICATION OF THE POLICY

6.1 This Policy shall apply to all individuals acting for or on behalf of ATPS.

6.2 Without limitation, this includes:

- (a) members of the Board of Directors;
- (b) members of Board Committees;
- (c) the Executive Director;
- (d) senior management;
- (e) all employees;
- (f) interns and volunteers;
- (g) national chapter coordinators and chapter office bearers;
- (h) research fellows and associates;
- (i) consultants and technical experts;
- (j) peer reviewers and proposal evaluators;
- (k) grant beneficiaries and sub-recipients;
- (l) suppliers, contractors, and service providers;
- (m) strategic partners where applicable.

6.3 Compliance with this Policy shall be mandatory and shall form part of contractual and fiduciary obligations.

PART III: GUIDING PRINCIPLES

7. PRINCIPLES OF APPLICATION

7.1 This Policy shall be implemented in accordance with the following principles:

- (a) **Integrity** – all actions shall uphold honesty and ethical conduct;
- (b) **Transparency** – interests shall be disclosed openly and timely;
- (c) **Accountability** – individuals shall be accountable for their conduct and declarations;
- (d) **Independence** – institutional decisions shall remain free from improper influence;
- (e) **Fairness** – all decisions shall be equitable and non-discriminatory;
- (f) **Stewardship** – institutional resources shall be used solely for legitimate organizational purposes;
- (g) **Confidentiality** – information accessed through official duties shall be protected;
- (h) **Professionalism** – decisions shall be guided by competence and objectivity.

PART IV: INTERPRETATION AND DEFINITIONS

8. DEFINITIONS

For purposes of this Policy:

8.1 “**Conflict of Interest**” means a situation where an individual’s personal, financial, professional, political, familial, or institutional interests interfere, could interfere, or may reasonably be perceived to interfere with their ability to act impartially in the interests of ATPS.

8.2 “**Actual Conflict**” means a conflict that presently exists.

8.3 “**Potential Conflict**” means a conflict likely to arise in the future.

8.4 “**Perceived Conflict**” means a situation that may appear to compromise objectivity even if no actual conflict exists.

8.5 “**Related Party**” includes spouses, parents, children, siblings, in-laws, business associates, and persons with close personal relationships.

8.6 “**Institutional Conflict**” means a conflict involving competing obligations between ATPS and another organization.

PART V: TYPES OF CONFLICTS OF INTEREST

9. FINANCIAL CONFLICTS

9.1 Financial conflicts include circumstances where an individual:

- (a) owns or controls a business transacting with ATPS;

- (b) benefits financially from decisions made on behalf of ATPS;
- (c) receives hidden commissions, inducements, or kickbacks;
- (d) has investments that may be influenced by ATPS decisions.

10. PROCUREMENT CONFLICTS

10.1 A procurement conflict shall arise where a person participates in procurement involving:

- (a) relatives;
- (b) associated businesses;
- (c) prior contractual relationships;
- (d) confidential knowledge that confers unfair advantage.

10.2 Such persons shall immediately disclose and recuse themselves.

11. RESEARCH CONFLICTS

11.1 ATPS recognizes that research integrity is central to its institutional mandate.

11.2 Research conflicts include:

- (a) sponsor influence over methodology or findings;
- (b) concealed funding relationships;
- (c) biased peer review;
- (d) suppression of adverse findings;
- (e) data manipulation;
- (f) publication bias.

12. GRANT MANAGEMENT CONFLICTS

12.1 Conflicts may arise in:

- (a) proposal evaluation;
- (b) grant awards;
- (c) budget approvals;
- (d) partner selection;
- (e) monitoring and evaluation decisions.

13. EMPLOYMENT AND CONSULTANCY CONFLICTS

- a) Employees shall avoid engagements that compromise their duties to ATPS.
- b) Staff shall disclose external consultancies.

14. POLITICAL CONFLICTS

- a) ATPS resources shall not be used to advance partisan political interests.
- b) Political affiliations shall not influence institutional decisions.

15. RELATIONAL CONFLICTS

- a) No person shall participate in decisions involving relatives or close associates.

PART VI: DISCLOSURE OBLIGATIONS

16. GENERAL DISCLOSURE DUTY

16.1 Every covered person shall disclose all conflicts.

16.2 Disclosure shall occur:

- (a) upon appointment;
- (b) annually;
- (c) before meetings;
- (d) before procurement or grant evaluations;
- (e) immediately upon becoming aware of a conflict.

17. STANDARD OF DISCLOSURE

- a) Disclosure shall be full, accurate, timely, and made in good faith.
- b) Failure to disclose shall constitute misconduct.

18. DECLARATION FORMS

18.1 ATPS shall maintain:

- (a) Annual Declarations;
- (b) Meeting-Specific Declarations;
- (c) Procurement Declarations;
- (d) Consultant Declarations;
- (e) Research Independence Declarations.

PART VII: MANAGEMENT OF CONFLICTS

19. ASSESSMENT OF DISCLOSED CONFLICTS

19.1 All disclosed conflicts shall be assessed based on:

- (a) materiality;
- (b) risk level;
- (c) reputational implications;
- (d) legal implications;
- (e) donor compliance implications.

20. MANAGEMENT MEASURES

20.1 ATPS may apply one or more of the following:

- (a) disclosure without further action;
- (b) recusal;
- (c) restricted access;

- (d) reassignment;
- (e) divestment;
- (f) independent oversight;
- (g) contract modification;
- (h) termination.

21. RECUSAL PROCEDURES

- 21.1 Any person with a conflict shall not:
- (a) vote;
 - (b) influence discussions;
 - (c) access confidential records;
 - (d) participate in evaluation processes.
- 21.2 Recusal shall be documented.

PART VIII: GOVERNANCE RESPONSIBILITIES

22. BOARD OF DIRECTORS

- a) The Board shall provide oversight over this Policy.
- b) Board members shall submit annual declarations.
- c) The Board Chair shall oversee compliance.

23. EXECUTIVE DIRECTOR

- a) The Executive Director shall ensure operational implementation.
- b) The Executive Director shall report annually to the Board.

24. HUMAN RESOURCE AND GOVERNANCE OFFICE

- 24.1 This office shall:
- (a) maintain the Register of Interests;
 - (b) coordinate disclosures;
 - (c) support investigations;
 - (d) train staff.

25. NATIONAL CHAPTERS

- 25.1 National Chapters shall operationalize this Policy.
- 25.2 Chapter Coordinators shall submit annual compliance reports.

PART IX: RESEARCH INTEGRITY

26. INDEPENDENCE OF RESEARCH

- a) ATPS research shall remain independent from donor, political, or commercial interference.
- b) All research funding shall be transparently disclosed.

27. PUBLICATION INTEGRITY

- a) Findings shall not be altered to satisfy funders.
- b) Publication decisions shall remain independent.

PART X: GIFTS, HOSPITALITY, AND BENEFITS

28. ACCEPTABLE GIFTS

28.1 Modest protocol gifts may be accepted where they do not influence judgment.

29. PROHIBITED BENEFITS

- 29.1 The following are prohibited:
- (a) cash;
 - (b) personal commissions;
 - (c) excessive hospitality;
 - (d) undisclosed travel sponsorship.

30. DECLARATION OF GIFTS

- a) Any gift exceeding US\$ 100 shall be declared.
- b) A Gifts Register shall be maintained.

PART XI: REPORTING, INVESTIGATIONS, AND WHISTLEBLOWING

31. REPORTING CHANNELS

- a) Suspected violations may be reported through internal or confidential channels or emailed to: whistleblowing@atpsnet.org

32. INVESTIGATIONS

- 32.1 Investigations shall follow:
- (a) preliminary assessment;
 - (b) formal inquiry;
 - (c) evidence collection;
 - (d) hearing;
 - (e) determination.

33. WHISTLEBLOWER PROTECTION

33.1 Retaliation against whistleblowers is prohibited.

33.2 ATPS shall establish secure and confidential channels for reporting suspected misconduct, including:

- (a) dedicated email reporting channels;
- (b) secure online reporting portals;
- (c) sealed written submissions;
- (d) independent ethics hotlines.

33.3 Whistleblowers may submit reports anonymously.

34. CONFLICT OF INTEREST REVIEW PROCESS

Step 1 – Disclosure - Individual submits declaration.

Step 2 – Assessment - Review conducted by:

- Executive Director
- Human Resources
- Governance Committee
- Board Chair (where applicable)

Step 3 – Decision - Appropriate mitigation measures determined.

Step 4 – Documentation - Decision recorded in Register of Interests.

Step 5 – Monitoring - Implementation monitored periodically.

PART XII: SANCTIONS

34. SANCTIONS

34.1 Violations may result in:

- (a) Verbal/written warning;
- (b) reprimand;
- (c) suspension;
- (d) termination of contract;
- (e) removal from governance positions;
- (f) contract cancellation;
- (g) recovery of losses;
- (h) legal action.

PART XIII: RECORDS AND CONFIDENTIALITY

35. REGISTER OF INTERESTS

35.1 ATPS shall maintain a confidential Register of Interests.

36. CONFIDENTIALITY

36.1 All disclosures and investigations shall remain confidential except where disclosure is required by law or donor obligations.

PART XIV: DONOR AND REGULATORY COMPLIANCE

37. DONOR OBLIGATIONS

- a) This Policy shall be interpreted consistently with donor requirements.
- b) Where donor rules are stricter, donor rules shall prevail.

38. REGULATORY COMPLIANCE

38.1 This Policy shall comply with applicable laws in jurisdictions where ATPS operates.

PART XV: REVIEW AND AMENDMENT

39. REVIEW

- a) This Policy shall be reviewed every three years.
- b) The Board may review earlier where circumstances require.

40. AMENDMENT

40.1 Amendments shall only be approved by the Board of Directors.

ANNEXES

ANNEX 1: ANNUAL CONFLICT OF INTEREST DECLARATION FORM

Name: _____

Position: _____

Department/Unit: _____

Date: _____

1. Do you have any financial interests that may conflict with ATPS activities? Yes / No

2. Do you hold positions in any external organizations? Yes / No

3. Do any relatives have business relationships with ATPS? Yes / No

4. Are you involved in any activities that may create actual, potential, or perceived conflicts?

Yes / No

If Yes

Details:

Declaration:

I declare that the information provided is true and complete to the best of my knowledge.

Signature: _____

Date: _____

ANNEX 2: MEETING-SPECIFIC DECLARATION FORM

Meeting: _____

Date: _____

Agenda Item:

Nature of Interest:

Action Taken:

- Participated
- Recused
- Left Meeting

Signature: _____

ANNEX 3: GIFTS AND HOSPITALITY REGISTER

Date Received: _____

Recipient Name: _____

Donor: _____

Description:

Estimated Value: _____

Decision:

Approved By:

Signature: _____

ANNEX 4: CONSULTANT AND RESEARCHER DECLARATION

Project: _____

Consultant Name: _____

I declare that I have disclosed all actual, potential, and perceived conflicts related to this assignment.

Signature: _____

Date: _____



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