

## **APSN Policy on Conflict of Interest**

### **Introduction**

1 This Policy is based on guidelines provided by National Council of Social Service. It reflects current knowledge on governance principles and guidelines for non-profit social service sector in the area of conflict of interest, both locally and internationally. It is meant to help APSN adopt good practices for better governance, accountability and transparency.

2 The Conflict of Interest Policy and Declaration form will be read by all staff and volunteers upon hiring, appointment or election to APSN as an acknowledgement of having understood the policy and that he/she will fully disclose to the Executive Committee of APSN when a conflict of interest situation arises.

### **Definition of Conflict of Interest**

3 Conflict of interest arises whenever the personal or professional interests of a board member, staff or volunteer are potentially interfering with the performance of their official duties to the organisations they serve in.

4 When actual, potential or perceived conflict of interest arises, the integrity, fairness and accountability of the VWO could be affected.

### **Conflict of Interest Situations**

5 Conflict of interests situations include but not limited to the following:

**a) Contract with vendors**

Where Executive Committee members, staff or volunteers have personal interest in business transactions or contracts that APSN may enter into, our policy is to require a declaration of such interest as soon as possible followed by abstention from discussion and decision-making on the matter (including voting on the transaction or contract). All such discussion and evaluation by the Executive Committee or relevant approving authority (e.g. Executive Director, school Principals and Centre heads) in arriving at the final decision on the transaction/contract should always be well documented.

**b) Vested interest in other organisations that have dealings/  
relationship with APSN**

Where Executive Committee members, staff or volunteers who have vested interest in other organisations that have dealings/relationship with APSN, and when matters involving the interests of both APSN and the other organisation are discussed, such members, staff or volunteers are required to make a declaration of such interest and if necessary, followed by abstention from discussion and decision-making on such matters.

**c) Joint Ventures**

Approval of the Executive Committee should be sought before APSN enters into any joint venture with external parties. Where Executive Committee members, staff or volunteers have interest in such ventures, such members, staff or volunteers are required to make a declaration of such interest and if necessary, followed by abstention from discussion and decision-making on the matter.

**d) Recruitment of staff with close relationship**

Recruitment of staff with close relationship (i.e. those who are more than just mere acquaintances) with current Executive Committee members, staff or volunteers should go through the established human resource procedures for recruitment. The Executive Committee member, staff or volunteer should make a declaration of such relationships and should refrain from influencing decision on the recruitment.

**e) Remuneration**

Executive Committee members and volunteers should serve without remuneration for their voluntary service to APSN so as to maintain the integrity of serving for public trust and community good instead of personal gain. However, APSN may reimburse Executive Committee members or volunteers for out-of-pocket expenses directly related to the service.

**f) Paid staff on the Executive Committee**

Paid staff, including the executive head and senior staff employed by APSN, should not serve as a member of the Executive Committee as it can pose issues of conflict of interest and role conflicts, and may raise doubts on the integrity of Executive Committee decisions. The executive head and senior staff can attend Executive Committee meetings, ex-officio, to provide information and facilitate necessary discussion but should not take part in the decision-making of the Executive Committee.

**g) Others**

- An Executive Committee member's organisation receives grant funding from the organisation he/she is serving.
- Prohibition on gifts, entertainment and other favours from any persons or entities which do or seek business with APSN.

## **How to Deal With Conflict of Interest**

6 Apart from this written Policy on conflict of interest, APSN requires Executive Committee members, staff and volunteers to adopt two other measures aimed at safeguarding the Association's integrity and accountability. These are:

- a. **Establish disclosure as a normal practice.** Disclosure can be carried out in three ways. In the first way, Executive Committee members, staff and volunteers shall be asked to disclose any general information about themselves that leads to actual or potential conflicts, at the start of their term of office. In the second way, as and when actual conflicts occur the Executive Committee member, staff and volunteer makes a declaration of his/her interest for that specific instance either verbally or in written and excuses himself/herself from decision making. In the third way, Executive Committee members, staff and volunteers shall be required to sign the Disclosure Form on the anniversary of their joining the Association or at the beginning of each calendar year.
- b. **Executive Committee members must lead by example an attitude and act of personal integrity.** As the Executive Committee holds the ultimate responsibility and is always accountable to public trust, Executive Committee members should uphold and maintain a standard of conduct such as the avoidance of conflict of interest to fulfill public trust responsibilities.

## **Disclosure Policy and Procedure**

7 Transactions with parties with whom a conflicting interest exists may be undertaken only if all of the following are observed:

- a. The conflicting interest is fully disclosed;
- b. The person with the conflict of interest is excluded from the discussion and approval of such transaction;
- c. A competitive bid or comparable valuation exists; and
- d. The Executive Committee has determined that the transaction is in the best interest of APSN.

8 Disclosure involving Executive Committee members should be made to the President (or if he/she is the one with the conflict, then to the Vice Presidents) who shall bring these matters to the Executive Committee.

9 The Executive Committee shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorised as just, fair and reasonable to APSN. The decision of the Executive Committee on these matters will rest in their sole discretion, and their concern must be the welfare of APSN and the advancement of its purpose.

10 All decisions made by the Executive Committee on such matters shall be minuted and filed.

11 This policy document must be read and understood by all Executive Committee members, staff and volunteers upon the start of office.

12 Any disclosure of interest made by Executive Committee members, staff and volunteers where they may be involved in a potentially conflicting situation(s), must be recorded, filed and updated appropriately by all specified parties.

### **Declaration**

I hereby confirm that I have read and understood the conflict of interest policy of the Association for Persons with Special Needs and that I will make full disclosure of interests, relationships and holdings that could potentially result in a conflict of interest. I will make full disclosure to the Executive Committee when a conflict of interest situation arises. I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the conflict of interest policy, I will notify the President/Vice President immediately.

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Signature

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Name & Designation

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Date