



Going to School Conflict of Interest Policy

Ensuring Ethical, Transparent, and Impartial Decision-Making at Going to School

1. Introduction

At **Going to School (GTS)**, we are committed to operating with the highest standards of **integrity, impartiality, and ethical governance**. This Conflict of Interest Policy is designed to protect the credibility and effectiveness of our work by ensuring that **all decisions are made solely in the best interests of the organization, children, communities, and stakeholders we serve**.

A conflict of interest—real, perceived, or potential—can undermine trust, distort accountability, and compromise impact. This policy provides **clear guidelines** to identify, disclose, manage, and resolve conflicts, enabling GTS to maintain a transparent and principled organizational culture.

2. Purpose

The purpose of this policy is to:

- Define what constitutes a **conflict of interest** in the context of GTS's work
- Promote **full transparency and disclosure** of any personal or professional interests that may interfere with impartial decision-making
- Provide procedures for **declaring, reviewing, and managing conflicts**
- Foster **public and internal trust** in GTS's ethical integrity, particularly in decisions that involve funding, procurement, partnerships, and hiring

3. Scope and Applicability

This policy applies to all individuals involved with GTS, including:

- Board members and trustees
- Executive leadership and senior management
- Full-time, part-time, and contract employees
- Interns, consultants, fellows, and volunteers
- Vendors, suppliers, and project partners
- Anyone involved in procurement, hiring, decision-making, or access to confidential or financial information



4. What is a Conflict of Interest?

A **conflict of interest** occurs when a person's personal, financial, or professional interests (or those of a close relation) **may interfere with their ability to act in the best interests of GTS.**

Common types of conflicts include:

- **Financial interest:** A team member stands to gain financially from a decision they influence (e.g., awarding a contract to a relative's business)
- **Familial or personal relationships:** Involvement in hiring, supervising, or evaluating someone with whom they have a close personal relationship
- **Board overlap:** Serving on a board or advisory role of another organization that receives funding from or competes with GTS
- **Gifts or favors:** Receiving gifts, hospitality, or special treatment that could influence judgment or loyalty
- **Dual employment:** Being employed or consulting for another organization whose interests conflict with those of GTS

Conflicts can be:

- **Actual:** A conflict exists now
- **Potential:** A conflict may arise in the future
- **Perceived:** A third party might believe a conflict exists, even if none exists in reality

5. Duty to Disclose

All covered individuals must:

- **Proactively disclose any actual, potential, or perceived conflicts** to their manager, HR, or the Ethics Committee
- Fill and update a **Conflict of Interest Disclosure Form** annually and upon any change in circumstance
- Recuse themselves from decisions, meetings, or reviews where their impartiality may be compromised

Disclosure must occur **before a decision is made**, not after.



6. Procedures for Managing Conflicts

Once a conflict is disclosed:

1. The issue is referred to the **GTS Ethics & Integrity Committee**
2. The Committee conducts a **review** to assess the severity, impact, and management options
3. Possible actions include:
 - Recusal from the decision or project
 - Transfer of responsibility to another team member
 - Termination of the external relationship (if high-risk)
 - Full documentation of the case in the **Conflict of Interest Register**
4. The outcome is communicated to all relevant parties and filed for audit/review

7. Confidentiality and Non-Retaliation

- All disclosures are handled with **confidentiality and discretion**
- No individual will face retaliation for reporting a conflict in **good faith**
- **Whistleblower protections** apply to those who report undisclosed conflicts or ethical violations related to this policy

8. Examples of Conflict Scenarios

Scenario	Is it a Conflict?	Action Required
An employee's spouse runs a printing firm bidding for a GTS contract	Yes – financial and personal	Must disclose; employee recuses from vendor selection
A program manager is asked to serve on a donor's advisory board	Potential – depends on duties	Must disclose and seek committee clearance
A team member accepts expensive gifts from a partner organization	Yes – perceived influence	Must report immediately and return gift
An intern volunteers for another NGO in the same community	Possibly – if missions overlap	Must disclose to avoid role confusion or resource conflict



9. Training and Awareness

- All new employees and board members are trained on this policy during induction
- Annual refresher training and re-signing of the **Ethics and Conflict of Interest Declaration** is required
- GTS leadership is responsible for modeling transparency and disclosure in decision-making

10. Record-Keeping and Oversight

- GTS maintains a **Conflict of Interest Register**, updated quarterly and reviewed by the **Board of Trustees**
- All actions taken are **documented and stored securely**
- An annual Conflict of Interest audit is conducted alongside ethics and governance reviews

11. Disciplinary Action for Non-Compliance

Failure to disclose a conflict of interest, or acting in self-interest, may result in:

- Formal warning or censure
- Removal from decision-making responsibilities
- Suspension or termination of employment/contract
- Referral to legal or regulatory authorities if financial fraud is involved

12. Review and Policy Evolution

This policy will be reviewed every **24 months**, or sooner if:

- There is a significant change in legal standards, funding terms, or organizational governance
- New ethical risks emerge
- The Ethics Committee identifies the need for updates based on internal reviews



13. Integration with Other Policies

This policy works in conjunction with:

- **Ethics & Integrity Policy**
- **Whistleblower Policy**
- **Procurement and Financial Policies**
- **Code of Conduct**
- **Child Protection and Safeguarding Policy**

Transparency is not optional—it is foundational. At GTS, we believe that managing conflicts of interest **honestly, proactively, and accountably** allows us to make decisions that reflect the dignity, fairness, and mission-centered values we seek to uphold.