



## **YOUTH FOR INTEGRITY BUILDING ORGANIZATION**



**JULY 2023.**



## PREAMBLE

As an organization committed to upholding the highest standards of integrity, transparency, and accountability, it is essential that we address conflicts of interest with utmost diligence. Conflict of interest situations can arise in various forms and have the potential to compromise our ability to make impartial decisions and act in the best interests of YIB and its stakeholders. At YIB, we define a conflict of interest as any situation in which personal, financial, or other interests could unduly influence or appear to influence an individual's decision-making or actions related to their role within the organization. Conflicts of interest can arise from financial investments, personal relationships, outside employment, or any other circumstance that may compromise objectivity or impartiality.

We emphasize the importance of prompt and transparent disclosure of conflicts of interest. All individuals associated with YIB, including employees, volunteers, board members, and contractors, are expected to promptly disclose any potential or actual conflicts of interest that may arise in the course of their duties. Disclosures should be made to the designated reporting authority, ensuring confidentiality and non-retaliation.

To effectively manage conflicts of interest, we have established policies, guidelines, and procedures that outline the steps for evaluating, mitigating, and resolving conflicts. These measures include independent evaluation, recusal, avoidance, and establishing conflict of interest committees to ensure fair and impartial decision-making. We encourage a culture of transparency, accountability, and ethical conduct. Through open and honest communication, we can address conflicts of interest proactively, protecting the integrity of our organization and maintaining the trust of our stakeholders.

By adhering to these principles and actively managing conflicts of interest, we demonstrate our commitment to the highest standards of governance and ethical behavior. Together, we can navigate potential conflicts with integrity and ensure that our actions align with our mission to create positive and lasting impact in our communities.

Thank you for your dedication to upholding these principles and for your continued commitment to the success of YIB.



Executive Director,  
Youth For Integrity Building (YIB)



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## 1. INTRODUCTION

1.1. **Youth For Integrity Building (YIB) Overview:** YIB is a community based organization established under the Community Groups Registration Act No. 30 of 2022.

1.2. **YIB organization Mission:** To empower young people with the knowledge, skills, and resources to become lead agents of change in promoting integrity, ethical leadership and social justice.

1.3. **YIB organization vision:** To build a world in which all individuals and communities have the tools and resources they need to sustainably thrive, and where integrity, democracy, and social justice are valued and promoted.

1.4. YIB strives to maintain the trust of our stakeholders and protect the reputation of YIB by addressing conflicts of interest in a fair, transparent, and proactive manner.

## 2. PURPOSE

To establish guidelines and procedures to identify, prevent, and manage conflicts of interest within the organization. The policy aims to ensure that all individuals involved with YIB act in the best interest of the organization and maintain the highest standards of integrity and transparency..

## 3. SCOPE

This policy applies to all individuals associated with YIB, including employees, volunteers, board members, committee members, consultants, and any other individuals who have a direct or indirect relationship with the organization. It encompasses all activities, decisions, and transactions involving YIB and its stakeholders.

## 5. DEFINITION OF TERMS

a. **Conflict of Interest:** A situation in which an individual's personal, financial, or other interests may compromise their ability to act in the best interest of Youth for Integrity Building (YIB). It involves a clash between an individual's private interests and their duty to YIB, potentially influencing their decision-making or actions.

b. **Personal Interest:** Any interest, financial or otherwise, that an individual has which could affect their impartiality, objectivity, or judgment in relation to YIB. This includes personal relationships, financial investments, employment, or any other circumstances that may create a conflict between personal gain and the best interests of YIB.

c. **Financial Interest:** Any direct or indirect financial relationship an individual has, including ownership, investments, compensation, or financial transactions, that may impact their ability to act in the best interest of YIB.

d. **Related Party:** Any individual who has a close relationship with an individual associated with YIB, such as family members, close friends, business partners, or organizations in which the individual has a financial or personal interest.



## **6. OBJECTIVES OF THIS POLICY.**

- 6.1. To promote disclosure and transparency in order to identify and address potential or actual conflicts of interest.
- 6.2. To prevent conflicts of interest that may compromise the impartiality, objectivity, or fairness of YIB's decision-making processes or actions.
- 6.3. To ensure that decisions made by individuals associated with YIB are based on the best interests of the organization and its stakeholders.
- 6.4. To protect the reputation and public trust in YIB by addressing conflicts of interest proactively.
- 6.5. To establish guidelines for ethical conduct and compliance with applicable laws and regulations.
- 6.6. To provide procedures for managing conflicts of interest and resolving them in an appropriate and fair manner..

## **7. POLICY STATEMENT**

At Youth for Integrity Building (YIB), we are committed to upholding the highest standards of integrity, transparency, and ethical conduct. This Conflict of Interest Policy is designed to ensure that all individuals associated with YIB act in the best interest of the organization and avoid conflicts that could compromise our mission and values. We strive to maintain the trust of our stakeholders and protect the reputation of YIB by addressing conflicts of interest in a fair, transparent, and proactive manner.

## **8. PRINCIPLES.**

- 8.1. To promote a culture of transparency and accountability by requiring individuals to disclose any potential or actual conflicts of interest that may arise in the course of their involvement with YIB.
- 8.2. To identify and prevent conflicts of interest that could compromise the impartiality, objectivity, or fairness of YIB's decision-making processes or actions.
- 8.3. This policy ensures that decisions made by individuals associated with YIB are based on the best interests of the organization and its stakeholders, rather than personal gain or external influences.
- 8.4. By addressing conflicts of interest proactively, the policy helps safeguard YIB's reputation and maintain public trust in the organization's integrity and ethical standards.
- 8.5. This policy establishes guidelines for ethical conduct and compliance with applicable laws and regulations, promoting a culture of integrity and professionalism within YIB.
- 8.6. This policy provides procedures for managing conflicts of interest, including mechanisms for recusal, decision-making processes, and appropriate actions to mitigate or eliminate conflicts when they arise.



## **9. ROLES AND RESPONSIBILITIES.**

### **9.1. Board of Directors:**

- The Board of Directors of YIB has the responsibility to establish and oversee the implementation of the Conflict of Interest Policy. They should ensure that the policy is communicated effectively, regularly reviewed, and enforced throughout the organization.

### **9.2. Executive Director:**

- The Executive Director, as the senior leader of YIB, is responsible for promoting a culture of integrity and ethical conduct. They should lead by example, ensure compliance with the Conflict of Interest Policy, and provide guidance to staff and stakeholders on identifying and managing conflicts of interest.

### **9.3. Employees and Volunteers:**

- All employees and volunteers associated with YIB have a responsibility to act in the best interest of the organization and avoid conflicts of interest. They should promptly disclose any potential or actual conflicts of interest and cooperate in the evaluation and management of such conflicts.

### **9.4. Reporting Authority:**

- YIB designates the Operations Manager and the Programmes Manager as the reporting authorities for conflicts of interest. They are responsible for receiving and evaluating conflict of interest disclosures, maintaining confidentiality, and overseeing the resolution process.

### **9.5. Disclosing Individuals:**

- Individuals associated with YIB have a responsibility to disclose any potential or actual conflicts of interest promptly and accurately. They should provide all relevant information related to the conflict, cooperate in the evaluation process, and follow any mitigation or management measures determined by YIB.

### **9.6. Evaluation Committee:**

- YIB may establish an evaluation committee responsible for reviewing and evaluating reported conflicts of interest. This committee should consist of impartial individuals who are not directly involved in the conflict and can make objective decisions based on the best interests of YIB.

### **9.7. Mitigation and Management:**

- Individuals involved in conflicts of interest should work with YIB to develop appropriate mitigation or management strategies. This include modifying roles, responsibilities, or relationships to eliminate or minimize the conflict and ensure that actions are taken in the best interest of YIB.

## **10. DISCLOSURE AND REPORTING**

### **10.1. Process:**

- a. YIB encourages all individuals to come forward with any potential or actual conflicts of interest they may have. The disclosure form can be found at the organization reception, procurement officer desk or the operations manager desk.
- b. The Operations manager and the Programmes Manager are the designated reporting authorities to whom conflicts of interest should be reported. Report via email [operations@yc4integritybuilding.org](mailto:operations@yc4integritybuilding.org) , [programmes@yc4integritybuilding.org](mailto:programmes@yc4integritybuilding.org) , via the





office contact detail, or in-person at the Operations Manager's desk or the Programmes Manager's desk.

- c. YIB assures all individuals that their disclosures will be treated with strict confidentiality and the information provided will only be shared with those involved in the evaluation and management of the conflict.
- d. Provide clear information on the nature of the conflict, the parties involved, any financial or personal interests, the potential impact on YIB, and any other financial or personal interest.
- e. Documentation of the disclosure shall include the date, time, and details provided. This documentation will serve as a record and assist in the evaluation and decision-making process..

#### **10.2. Timing:**

- a. YIB emphasizes on the importance of immediate reporting of potential or actual conflicts of interest. All individuals are encouraged to report conflicts as soon as they become aware of them, without delay.
- b. All individuals should disclose any pre-existing conflicts of interest upon joining YIB or becoming aware of the policy. This ensures transparency and allows for appropriate management of conflicts from the outset.
- c. YIB encourages individuals to continually assess their activities and relationships to identify any new conflicts of interest that may arise during their involvement with YIB. YIB underscores the importance of reporting these conflicts promptly.
- d. Individuals involved in procurement or financial decision-making may be required to disclose conflicts 5 days before specific transactions or projects.
- e. Periodic reminders should be send to individuals associated with YIB about the importance of timely reporting of conflicts of interest. This helps ensure that conflicts are not overlooked or unintentionally withheld..

#### **10.3. Information to be disclosed:**

- a. Nature of the Conflict: Individuals should provide a clear description of the conflict, including the specific circumstances, relationships, or activities involved that may give rise to a conflict of interest.
- b. Parties Involved: Identify all parties who may be affected by or have a vested interest in the conflict. This includes individuals associated with YIB, such as colleagues, supervisors, or subordinates, as well as external parties, such as family members, business partners, or organizations.
- c. Financial or Personal Interests: Disclose any financial or personal interests that may be related to the conflict. This includes ownership or investment in companies or organizations, employment or consultancy arrangements, gifts or favors received, or any other factors that could influence decision-making.
- d. Potential Impact on YIB: Assess and disclose the potential impact that the conflict may have on YIB, its operations, reputation, or stakeholders. This includes considering any potential bias, compromised decision-making, or adverse effects on the organization's mission or values.
- e. Relevant Documentation: If applicable, provide any relevant documentation or evidence that supports the disclosure of the conflict. This may include contracts, agreements, financial statements, or correspondence that substantiates the conflict and its potential impact..



#### **10.4. Confidentiality:**

- a. Assurance of Confidentiality: All disclosures of conflicts of interest will be treated with utmost confidentiality. YIB assures all individuals that their privacy will be respected, and the information provided will only be shared with those directly involved in evaluating and managing the conflict.
- b. Limited Access: YIB restricts access to the disclosure information to only those individuals who need to be involved in the evaluation and decision-making process. This includes the designated reporting authority, members of the evaluation committee (if applicable), and any other relevant parties directly involved in addressing the conflict.
- c. Non-Retaliation: YIB reinforces the commitment to non-retaliation against individuals who disclose conflicts of interest in good faith. YIB assures individuals that they will not face adverse consequences or retaliation for their disclosure and encourage a culture of openness and trust.
- d. Data Protection: YIB complies with applicable data protection and privacy laws to safeguard the confidentiality of the disclosed information. Appropriate security measures are in place to protect against unauthorized access, use, or disclosure of the information.
- e. Anonymous Reporting: YIB provides an option for individuals to report conflicts of interest anonymously if they have concerns about revealing their identity. They may do so through the suggestion boxes at the office reception or via the YIB's postal address.

### **11. EVALUATION AND DECISION-MAKING**

#### **11.1. Impartiality:**

- a. YIB emphasizes the need for impartial evaluation and decision-making when addressing conflicts of interest.
- b. Individuals involved in the conflict should recuse themselves from the evaluation process to maintain objectivity.

#### **11.2. Evaluation Committee:**

- a. If applicable, the Executive Director shall nominate an evaluation committee responsible for reviewing and evaluating conflicts of interest.
- b. The committee members should be impartial and have no direct involvement in the conflict being evaluated.

#### **11.3. Criteria and factors for Evaluation:**

- a. Assess the nature and scope of the conflict to understand its potential impact on YIB. Consider whether the conflict involves financial interests, personal relationships, or other factors that could compromise objectivity or impartiality.
- b. Evaluate the extent to which the conflict aligns with or contradicts YIB's mission, values, and ethical standards. Determine whether the conflict poses a risk to the organization's reputation, integrity, or ability to fulfill its mission.
- c. Consider the financial implications of the conflict on YIB. Evaluate whether the conflict could result in financial gain or loss for the organization or its stakeholders. Assess the potential for undue influence or bias in financial decision-making.
- d. Assess the individual's ability to act impartially and objectively despite the conflict. Consider whether the conflict could compromise the individual's judgment, decision-making, or ability to prioritize YIB's best interests.





- e. Evaluate how the conflict may affect YIB's stakeholders, including beneficiaries, partners, donors, and the wider community. Determine whether the conflict could result in preferential treatment, unfair advantages, or disadvantages for any stakeholder group.
- f. Ensure that the conflict of interest is evaluated in light of applicable laws, regulations, and governance requirements. Assess whether the conflict violates any legal or regulatory obligations and determine the potential consequences of non-compliance.
- g. Consider the feasibility and effectiveness of potential mitigation or management measures to address the conflict. Evaluate whether the conflict can be reasonably managed without compromising YIB's integrity or the individual's ability to fulfill their responsibilities.
- h. Review industry standards, best practices, and any relevant precedents to inform the evaluation of the conflict. Consider how similar conflicts have been handled in other organizations or sectors to guide decision-making.
- i. Assess the potential impact of the conflict on YIB's transparency and public perception. Determine whether the conflict, if disclosed or discovered, could erode trust, damage relationships, or create reputational risks for the organization.
- j. Evaluate the conflict from an ethical standpoint, considering principles such as fairness, honesty, integrity, and accountability. Determine whether the conflict raises ethical concerns or violates ethical codes or principles.

#### **11.4. Decision-Making:**

- a. Review the findings from the evaluation of the conflict of interest, considering the criteria and factors outlined earlier. Ensure a thorough understanding of the nature, impact, and potential risks associated with the conflict.
- b. Identify and assess potential options and alternatives for addressing the conflict of interest. Consider mitigation measures, management strategies, or any necessary changes to roles, responsibilities, or relationships to minimize or eliminate the conflict.
- c. Evaluate the feasibility and effectiveness of each option or alternative. Consider the resources required, potential impact on stakeholders, and the ability to maintain transparency, integrity, and compliance with legal and regulatory obligations.
- d. Seek input and consultation from relevant parties, such as the reporting authority, members of the evaluation committee (if applicable), legal advisors, or other stakeholders who may have valuable insights or expertise related to the conflict.
- e. Based on the evaluation, analysis, and consultation, make a decision on how to address the conflict of interest. Select the option or alternative that best aligns with YIB's mission, values, and the best interests of the organization and its stakeholders.

#### **11.5. Communication:**

- a. Develop a plan for communicating the decision and findings to the relevant parties involved. Consider the appropriate timing, channels, and level of detail required for effective communication.
- b. Clearly and transparently communicate the decision, explaining the rationale and considerations that led to the chosen course of action. Provide a clear explanation of how the conflict will be managed or mitigated, emphasizing the commitment to integrity and the best interests of YIB.
- c. Be prepared to address any concerns or questions that may arise from the communication of the decision. Provide opportunities for individuals to seek



clarification or express their views, ensuring that their perspectives are heard and respected.

- d. Maintain records of the communication, including any documentation or evidence shared to support the decision. This documentation serves as a reference and can be used to demonstrate transparency, compliance, and accountability in the decision-making process.
- e. The Operations Manager and/or the Programmes Manager shall follow up on the implementation of the decision and monitoring its effectiveness and report the same to the Executive Director. They should regularly assess the impact of the decision and make adjustments as necessary to ensure ongoing management of the conflict of interest.

#### **11.6. Mitigation and Management:**

If a conflict of interest is determined, appropriate mitigation or management measures should be implemented to address the conflict. This may involve modifying roles, responsibilities, or relationships to eliminate or minimize the conflict while ensuring the best interests of YIB are upheld.

#### **11.7. Appeals Process:**

- a. All concerned individuals are allowed to lodge an appeal following procedural errors, new evidence, or a belief that the original decision was unjust or biased. YIB reinforces that appeals cannot be made solely on the basis of disagreement with the decision.
- b. The Executive Director with advise from the board, shall create appeals committee consisting of individuals who are impartial and have no direct involvement in the conflict of interest under appeal. This committee should have the authority to review and reconsider decisions related to conflicts of interest.
- c. The appeal must be submitted to the organization in a sealed envelop addressed to the Evaluation Committee chairperson or to the Executive Director within 14 working days after the decision.
- d. The appeal should clearly outlining the grounds for appeal and any supporting evidence.
- e. The Appeal Committee shall conduct a thorough examination of the original decision, the grounds for appeal, and any additional evidence or documentation provided. The committee shall also have the authority to request further information or clarification from the parties involved.
- f. The original decision-making body or individuals shall be invited to respond to the appeal. This ensures a fair and balanced evaluation of the appeal and allows for all perspectives to be considered.
- g. Once the appeals committee has reviewed the appeal and considered all relevant information, they shall make a decision on whether to uphold, modify, or overturn the original decision. This decision shall be communicated in writing and include a clear rationale for the outcome.
- h. It is important to note that the decision made by the Appeals Committee is final and binding. There will be no further avenues for appeal within YIB after the Appeals Committee has reached a decision.
- i. Accurate records of the appeal process shall be kept, including the appeal submission, responses, and the final decision. This documentation serves as evidence of the fair and transparent handling of the appeal.



### **11.8. Documentation:**

YIB underscores the importance of documenting the evaluation and decision-making process as a reference for future actions and ensure transparency and accountability. Records of conflict disclosures, evaluations, decisions, and any actions taken to manage or mitigate conflicts of interest shall be kept safely.

## **12. MITIGATION AND MANAGEMENT**

### **12.1. Mitigation Strategies:**

- All individual are encouraged to disclose potential or actual conflicts of interest promptly and transparently. This allows for early identification and proactive management of conflicts.
- YIB shall ensure that this policy is and other related policies are accessible to all members of the organization.
- YIB shall have in-house education and training sessions to raise awareness about conflicts of interest and their potential impact.
- Independent individuals or committees are assigned to evaluate and make decisions regarding conflicts of interest.
- YIB encourages individuals with conflicts of interest to recuse themselves from decision-making processes or activities where their personal interests could influence outcome.
- Ongoing monitoring and review of potential conflicts of interest shall be done by the designated persons. They shall regularly assess individuals' activities, relationships, and financial interests to identify any new or evolving conflicts that may arise.
- YIB shall engage external experts or consultants to conduct periodic reviews of the organization's conflict of interest management processes. Their independent perspective can provide valuable insights and recommendations for improvement.
- Thorough records of all disclosed conflicts of interest, evaluation processes, and decisions made shall be safely kept.

### **12.2. Monitoring and Review:**

- a. YIB emphasizes the importance of ongoing monitoring and review of conflicts of interest to ensure that mitigation strategies are effective.
- b. Assessing the impact of implemented measures and make adjustments as necessary shall be done regularly.

### **12.3. Conflicts of Interest Policy Acknowledgment:**

- a. All individuals associated with YIB are required to acknowledge their understanding of this conflict of interest policy and their commitment to comply with its provisions.
- b. This acknowledgment shall be obtained through a signed agreement or an electronic acceptance during the first engagement with YIB.

### **12.4. Training and Education:**

- a. YIB shall conduct annual in-house training sessions and educational programs to raise awareness about conflicts of interest and provide guidance on identifying, disclosing, and managing them effectively.
- b. YIB shall ensure that all individuals associated with YIB have access to these resources.



### **12.5. Annual Declarations:**

All individuals associated with YIB are required to provide annual declarations regarding any potential conflicts of interest. This shall help to ensure ongoing transparency and allow for timely identification and management of conflicts..

## **13. COMPLIANCE AND ENFORCEMENT**

### **13.1. Consequences of Non-Compliance:**

- This attracts disciplinary actions, termination of employment or engagement, or legal consequences if the violation involves illegal activities.

### **13.2. Whistleblower Protection:**

- All individuals who report conflicts of interest or non-compliance with the policy shall be protected as per the YIB whistleblower policy. YIB assures all all the individuals will not face retaliation or adverse consequences for reporting in good faith.

### **13.3. Reporting and Investigation Procedures:**

This process shall follow all that has been indicated on section 10, 11, and 12 above.

### **13.4. Record-Keeping:**

Accurate records of reported conflicts of interest, investigations, and actions taken to address non-compliance shall be maintained. These records serve as evidence of YIB's commitment to integrity and can be used for reference or auditing purposes.

## **14. REGULAR REVIEW**

This policy shall be reviewed annually to ensure its effectiveness and relevance.

## **15. RELATED POLICIES**

This policy should be read in conjunction with the following policies;-

- i. Code of Conduct
- ii. Equal Employment Opportunity Procedure
- iii. Grievance Procedure
- iv. Whistleblower Policy
- v. Data protection and privacy policy
- vi. Safeguarding policy



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