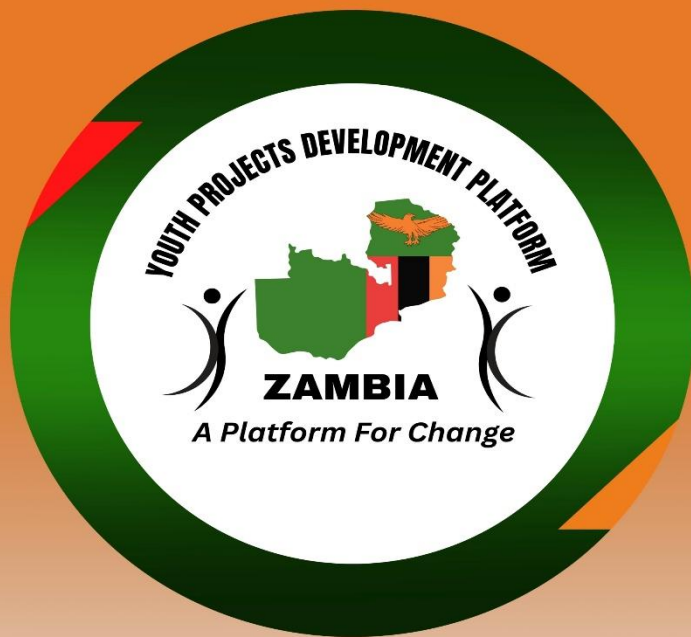




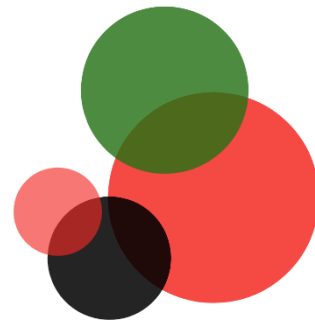
**Youth Projects
Development Platform**

CONFLICT OF INTEREST POLICY

*A Community of Visionary Youths,
A Platform for Change*

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The Youth Projects Development Platform



Youth Projects Development Platform

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THE CONFLICT OF INTEREST POLICY

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APPROVAL AND SIGNATORIES

This Conflict of Interest Policy has been reviewed and approved by the Board of Directors of the Youth Projects Development Platform (YPDP). It is binding on all Board members, staff, volunteers, interns, consultants, contractors, associates, and other persons acting on behalf of or representing YPDP, as defined within the scope of this Policy. The Policy shall take effect from the date of approval and shall remain in force until amended or replaced in accordance with YPDP's policy review and approval procedures.

Name	Position	Signature	Date
Patience Mumbi	Board Chair	_____	16/12/2025
Patrick Mweetwa	Executive Director	_____	16/12/2025

DOCUMENT CONTROL

Item	Details
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Approving Authority	YPDP Board

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1. INTRODUCTION

The Youth Projects Development Platform (YPDP) recognizes that maintaining integrity, transparency, accountability, and public trust is essential to achieving its mission and protecting the interests of the organization, its beneficiaries, partners, donors, staff, and other stakeholders. Conflicts of interest may arise when personal, family, financial, professional, or other interests interfere, or appear to interfere, with an individual's ability to make impartial and objective decisions on behalf of YPDP. If not appropriately identified and managed, conflicts of interest may undermine organizational decision-making, create opportunities for favoritism or misuse of organizational resources, and expose YPDP to financial, legal, operational, and reputational risks. The existence of a conflict of interest does not necessarily mean that wrongdoing has occurred; however, failure to disclose and appropriately manage a conflict may compromise the integrity of organizational processes.

This Conflict of Interest Policy establishes a clear framework for identifying, disclosing, assessing, managing, documenting, and monitoring conflicts of interest. It promotes openness, responsible conduct, and impartial decision-making and supports YPDP's commitment to ethical governance and effective stewardship of organizational resources.

2. PURPOSE OF THE POLICY

The purpose of this policy is to establish a clear and consistent framework for preventing, identifying, disclosing, assessing, managing, and resolving actual, potential, and perceived conflicts of interest within the Youth Projects Development Platform. The Policy is intended to ensure that decisions, actions, and transactions undertaken on behalf of YPDP are guided by integrity, impartiality, transparency, accountability, and the best interests of the organization. Specifically, the Policy seeks to promote the timely disclosure of personal, family, financial, professional, or other interests that may improperly influence, or appear to influence, an individual's duties and responsibilities. It further provides guidance on appropriate measures for managing identified conflicts, including disclosure, recusal, independent review, reassignment of responsibilities, or other suitable mitigation measures. Through this framework, YPDP aims to safeguard its resources, reputation, decision-making processes, and relationships with beneficiaries, partners, donors, and other stakeholders, while strengthening ethical conduct, good governance, and compliance with applicable organizational requirements.

3. SCOPE AND APPLICABILITY

This Conflict of Interest Policy applies to all individuals involved in the governance, management, operations, programmes, activities, and decision-making processes of YPDP. It is binding on all members of the Board of Directors, staff, volunteers, interns, consultants, contractors, associates, suppliers, service providers, and any other persons acting on behalf of or representing YPDP. The Policy applies to all actual, potential, and perceived conflicts of interest arising from personal, family, financial, professional, business, political, or other interests that may influence, or appear to influence, the impartial performance of an individual's duties or the integrity of YPDP's decisions and processes.

It applies across all areas of YPDP's operations, including governance, programme implementation, procurement, recruitment and human resource processes, financial management, beneficiary selection, partnerships, and other organizational transactions and activities. All persons covered by this Policy are required to comply with its provisions and to promptly disclose any conflict of interest in accordance with the procedures established herein.

4. DEFINITIONS AND TERMINOLOGY

For the purposes of this Policy, the following terms shall have the meanings set out below:

Conflict of Interest: A situation in which an individual's personal, family, financial, professional, business, or other interests may improperly influence, or reasonably appear to influence, the objective and impartial performance of their duties and responsibilities on behalf of YPDP.

Actual Conflict of Interest: A situation in which an individual's private interests directly conflict with their official duties or responsibilities and may influence their decisions or actions.

Potential Conflict of Interest: A situation in which an individual's private interests could develop into an actual conflict of interest in the future.

Perceived Conflict of Interest: A situation in which a reasonable person may believe that an individual's private interests could improperly influence the performance of their duties, whether or not such influence actually exists.

Personal Interest: Any interest, relationship, activity, obligation, or circumstance that may affect, or appear to affect, an individual's ability to act objectively and in the best interests of YPDP.

Financial Interest: Any direct or indirect financial benefit or interest, including ownership, investment, employment, payment, compensation, or other economic benefit.

Close Relative or Family Member: A spouse, partner, parent, child, sibling, or any other person whose close relationship with an individual could reasonably give rise to a conflict of interest.

Disclosure: The timely declaration of an actual, potential, or perceived conflict of interest in accordance with this Policy.

Recusal: The withdrawal of an individual from participating in discussions, decisions, evaluations, approvals, or other processes in which they have a conflict of interest.

YPDP: The Youth Projects Development Platform.

5. GUIDING PRINCIPLES

The implementation and interpretation of this Policy shall be guided by the following principles:

- **Integrity:** All persons covered by this Policy shall act honestly, ethically, and in the best interests of YPDP, avoiding situations in which personal interests may improperly influence organizational decisions.
- **Transparency:** Actual, potential, and perceived conflicts of interest shall be disclosed promptly and openly through the appropriate reporting and declaration procedures.
- **Impartiality:** Decisions and actions undertaken on behalf of YPDP shall be based on objective, fair, and relevant considerations, free from improper personal influence or favoritism.
- **Accountability:** Individuals shall take responsibility for identifying and disclosing conflicts of interest and for complying with measures established to manage or resolve them.
- **Fairness:** All organizational processes, including procurement, recruitment, beneficiary selection, and partnerships, shall be conducted fairly and without undue advantage to any individual or related party.
- **Confidentiality:** Information disclosed in relation to conflicts of interest shall be handled responsibly and shared only with persons authorized to assess, manage, or monitor the matter.
- **Prevention and Early Disclosure:** YPDP shall promote the early identification and disclosure of conflicts to prevent risks from affecting organizational decisions, resources, or operations.

- **Non-Retaliation:** No person shall be subjected to retaliation or unfair treatment for making a genuine and good-faith disclosure of a conflict of interest.
- **Responsible Stewardship:** All persons shall protect and use YPDP's resources, authority, information, and opportunities solely for legitimate organizational purposes.

6. STANDARDS OF CONDUCT

All persons covered by this Policy shall maintain the highest standards of integrity, honesty, impartiality, and professional conduct when carrying out duties or making decisions on behalf of YPDP. They shall act in good faith and place the legitimate interests of YPDP above personal, family, financial, professional, political, or other interests that may conflict with their organizational responsibilities.

Persons covered by this Policy shall avoid situations that may create an actual, potential, or perceived conflict of interest. Where such a conflict arises or is reasonably likely to arise, the individual shall promptly disclose it through the procedures established under this Policy and cooperate fully in its assessment and management.

No person shall use their position, authority, access to information, organizational resources, or influence to obtain an improper advantage for themselves, family members, associates, or other related parties. Individuals shall not participate in discussions, evaluations, decisions, approvals, or transactions where their personal interests may compromise, or reasonably appear to compromise, their impartiality, unless appropriate management measures have been formally determined.

All persons shall comply with disclosure, recusal, confidentiality, and other conflict-management requirements established under this Policy and shall cooperate with YPDP in maintaining ethical, transparent, and accountable organizational processes.

7. PROHIBITED CONDUCT AND CONFLICT-OF-INTEREST SITUATIONS

All persons covered by this Policy shall avoid conduct and situations that create, contribute to, or improperly influence YPDP's decisions, operations, resources, reputation, or relationships. The following conduct is prohibited or, where indicated, shall be promptly disclosed and managed in accordance with this Policy.

- a. **Political or Religious Propaganda:** Using YPDP's name, resources, programmes, activities, premises, authority, or position to promote personal political or religious interests or to engage in political or religious propaganda is prohibited.
- b. **Incompatible External Affiliations:** Participation in activities or membership in organizations, alliances, or associations whose objectives or activities are in significant conflict with YPDP's mission, values, activities, or good reputation is prohibited where such involvement compromises, or may reasonably be perceived to compromise, an individual's duties to YPDP.
- c. **External Employment and Activities:** External employment, business interests, consultancy, or other activities outside YPDP shall not contradict YPDP's activities or values, damage its reputation, interfere with the proper performance of organizational duties, or create a security risk to the organization. Any actual, potential, or perceived conflict arising from such activities shall be disclosed promptly.
- d. **Donations, Benefits and Other Advantages:** No person shall accept donations, gifts, benefits, or other advantages from YPDP's partners or business associates for personal use where doing so may influence, or reasonably appear to influence, their duties or decisions. Any gift, benefit, or donation received in connection with an individual's role at YPDP shall be declared and handled in accordance with this Policy and applicable organizational procedures.
- e. **Misuse of Confidential Information:** The use or disclosure of confidential information obtained through an individual's relationship with YPDP for personal benefit or for the benefit of another person or entity is prohibited.
- f. **Misuse of Position or Authority:** No person shall use their position, authority, influence, or association with YPDP for personal benefit or for the benefit of a family member, associate, or other third party. This includes improperly influencing competitions, selections, evaluations, recruitment, procurement, partner selection, the awarding of sub-awards, or the administration of organizational agreements or resources.
- g. **Preferential Treatment of Family Members:** No person shall improperly favour or provide undue advantage to a family member in matters relating to employment, recruitment, supervision, promotion, procurement, contracting, beneficiary selection, or any other YPDP decision or process. Where a family or close personal relationship exists, the relationship shall be disclosed and appropriately managed.

- h. Intimate or Sexual Relationships with Beneficiaries:** Any intimate or sexual relationship between a person covered by this Policy and a YPDP beneficiary that creates an actual, potential, or perceived conflict of interest shall be promptly disclosed to the relevant senior manager and managed in accordance with this Policy. The existence of a genuine or long-term relationship does not remove the obligation to disclose where the relationship may affect, or reasonably appear to affect, the individual's impartiality, professional responsibilities, or decision-making.

Relationships involving abuse of power, exploitation, coercion, or unequal power dynamics shall be addressed under YPDP's applicable safeguarding, prevention of sexual exploitation and abuse, and other relevant policies and procedures.

8. ROLES AND RESPONSIBILITIES

Effective implementation of this Policy requires clear responsibilities at all levels of YPDP. All persons covered by this Policy shall contribute to the prevention, identification, disclosure, and appropriate management of conflicts of interest.

Board of Directors

The Board shall provide overall oversight of this Policy and promote a culture of integrity, transparency, and accountability within YPDP. The Board shall ensure that conflicts involving Board members or the Executive Director are appropriately disclosed, assessed, managed, and documented. The Board shall also approve this Policy and any subsequent amendments in accordance with YPDP's governance procedures.

Board Chairperson

The Board Chairperson shall oversee the appropriate handling of conflicts of interest involving members of the Board and shall ensure that affected members do not improperly participate in discussions or decisions relating to matters in which they have a conflict. Where the Board Chairperson has a conflict of interest, the matter shall be referred to the Board for appropriate management.

Executive Director

The Executive Director shall be responsible for supporting the implementation of this Policy and ensuring that appropriate systems and procedures are in place for the disclosure, assessment, management, documentation, and monitoring of conflicts of interest. The Executive Director shall ensure that staff are informed of their obligations and that appropriate action is taken where conflicts are identified or non-compliance occurs.

Senior Management and Line Managers

Senior managers and line managers shall promote compliance with this Policy within their respective areas of responsibility. They shall provide guidance to staff, receive and appropriately escalate disclosures, support the assessment and management of conflicts, and ensure that agreed mitigation measures are implemented and monitored.

All Staff and Other Persons Covered by the Policy

All persons covered by this Policy shall act in accordance with its provisions and take reasonable steps to identify actual, potential, or perceived conflicts of interest. They shall promptly disclose such conflicts, comply with agreed management measures, including recusal where required, and cooperate fully with any assessment, review, or monitoring process.

9. DISCLOSURE AND DECLARATION OF CONFLICTS OF INTEREST

All persons covered by this Policy have a duty to promptly disclose any actual, potential, or perceived conflict of interest that arises in connection with their duties, responsibilities, decisions, or activities on behalf of YPDP. Disclosure shall be made as soon as the individual becomes aware of the conflict and before participating further in any related discussion, decision, evaluation, approval, or transaction, where practicable.

Duty to Disclose: An individual shall disclose any personal, family, financial, professional, business, or other interest or relationship that may improperly influence, or reasonably appear to influence, the performance of their duties or the impartiality of a YPDP process.

When Disclosure Must Be Made: Conflicts of interest shall be disclosed upon appointment, engagement, or commencement of duties where relevant interests already exist; immediately when a new conflict arises or circumstances change; and whenever an individual is required to participate in a decision or process in which they may have a conflict.

Annual Declaration: Board members, staff, and other persons designated by YPDP shall complete a Conflict of Interest Declaration at least once every year. The annual declaration does not replace the obligation to disclose new or changed circumstances as they arise.

Disclosure of Conflicts Involving Others: Any person who becomes aware of a potential conflict of interest involving another person covered by this Policy is encouraged to report the matter in good faith through the appropriate reporting or management channels.

Declaration Process: Disclosures and declarations shall be made using the prescribed Conflict of Interest Declaration Form provided in the Annex to this Policy or through another approved reporting mechanism. All disclosures shall contain sufficient and accurate information to enable YPDP to assess the nature and extent of the conflict and determine appropriate management measures.

10. ASSESSMENT, MANAGEMENT AND RESOLUTION OF CONFLICTS

All disclosed actual, potential, or perceived conflicts of interest shall be assessed promptly and fairly to determine their nature, extent, potential impact, and the most appropriate measures for managing or resolving them.

- a. Initial Assessment:** Upon receiving a disclosure, the relevant manager or authorized person shall review the information provided and, where necessary, seek additional information to determine whether a conflict of interest exists and whether it is actual, potential, or perceived.
- b. Assessment of the Conflict:** The assessment shall consider the nature of the individual's interest, the duties or decisions affected, the level of influence or control held by the individual, the potential impact on YPDP, and whether a reasonable person could perceive the situation as compromising impartiality or integrity.
- c. Management Measures:** Depending on the nature and seriousness of the conflict, YPDP may apply one or more of the following measures:
 - i.** Removal of the Conflict: Requiring the individual to relinquish the interest or discontinue the activity creating the conflict;
 - ii.** Disclosure and Monitoring: Allowing the individual to continue in their role subject to formal disclosure and appropriate oversight;
 - iii.** Recusal: Requiring the individual to withdraw from discussions, evaluations, decisions, approvals, or other processes related to the conflict;

- iv. **Reassignment of Responsibilities:** Transferring specific duties, decision-making authority, or responsibilities to another appropriate person;
 - v. **Independent Review or Additional Oversight:** Subjecting the relevant process or decision to independent review, enhanced supervision, or other control measures; or
 - vi. **Other Appropriate Measures:** Applying any other reasonable and proportionate action necessary to protect the integrity of YPDP's decisions and operations.
- d. Decision and Documentation:** The decision on how a conflict will be managed or resolved shall be documented, including the nature of the conflict, the assessment undertaken, the management measures agreed, the responsible persons, and any required follow-up actions. The affected individual shall comply with the measures determined by YPDP.
- e. Follow-Up and Review:** Where a conflict requires ongoing management, the relevant manager or authorized person shall monitor compliance with the agreed measures and review their effectiveness as necessary. Management arrangements may be revised where circumstances change or where the measures are no longer sufficient to protect the interests and integrity of YPDP.

11. REPORTING AND ESCALATION PROCEDURES

YPDP shall ensure that all persons covered by this Policy understand the appropriate channels for reporting and escalating actual, potential, or perceived conflicts of interest. Where a person is uncertain about the appropriate reporting channel, they shall seek guidance from the next appropriate level of management.

Staff, Volunteers, Interns and Other Personnel

A conflict involving a staff member, volunteer, intern, or other personnel shall be disclosed to the relevant Line Manager or Supervisor. Where the Line Manager or Supervisor is involved in the conflict, the matter shall be reported to the next appropriate level of management or directly to the Executive Director.

Heads of Department and Senior Management

A conflict involving a Head of Department, senior manager, or other senior staff member shall be disclosed to the Executive Director. Where the matter is serious, sensitive, or presents a significant risk to YPDP, the Executive Director may refer it to the Board of Directors or an appropriate Board Committee.

Executive Director

A conflict involving the Executive Director shall be disclosed to the Board Chairperson. The Board Chairperson shall ensure that the matter is appropriately assessed and, where necessary, referred to the Board of Directors or an appropriate Board Committee. The Executive Director shall not participate in decisions relating to the conflict.

Members of the Board of Directors

A Board member who has an actual, potential, or perceived conflict of interest shall disclose the matter to the Board Chairperson and ensure that the disclosure is appropriately recorded. The affected Board member shall withdraw from discussions, deliberations, and voting on the matter and shall not attempt to influence the decision.

Board Chairperson

Where a conflict involves the Board Chairperson, the matter shall be disclosed to the Board of Directors or to a designated non-conflicted Board member. The Board shall determine the appropriate mechanism for assessing, managing, and resolving the conflict, and the Board Chairperson shall not participate in decisions concerning their own conflict.

Consultants, Contractors, Suppliers and Other Associates

A conflict involving a consultant, contractor, supplier, partner, or other associate shall be reported to the YPDP staff member responsible for managing the relevant relationship. The matter shall be escalated to the appropriate senior manager, the Executive Director, or the Board where necessary, depending on its nature and seriousness.

Serious or High-Risk Conflicts

Conflicts involving significant financial resources, procurement, recruitment of relatives or close associates, misuse of organizational information or assets, donor funds, senior management, Board members, or a significant risk of fraud, corruption, favoritism, legal liability, or reputational damage shall be treated as serious or high-risk conflicts.

Such matters shall be formally documented and escalated to the appropriate authority, including the Executive Director or Board of Directors, depending on the person involved and the nature of the conflict. Where there is a reasonable indication of fraud, corruption, criminal conduct, or another breach of applicable law, YPDP may take further action, including referral to the relevant authorities, in accordance with applicable law and organizational policies.

12. SPECIFIC AREAS OF CONFLICT OF INTEREST

Conflicts of interest may arise in various areas of YPDP's governance, operations, programmes, and decision-making processes. The following provisions provide specific guidance for areas where conflicts may present particular risks.

Procurement

Any person involved in procurement who has a personal, family, financial, or other interest in a supplier, contractor, or service provider shall disclose the conflict before participating in the procurement process. The conflicted person shall not participate in the evaluation, recommendation, negotiation, approval, or award of the relevant contract. All procurement processes shall remain fair, competitive, transparent, and properly documented.

Recruitment and Human Resources

Any person involved in recruitment, appointment, promotion, performance management, supervision, or approval of staff benefits shall disclose any family, personal, or financial relationship that may influence, or reasonably appear to influence, the process. A person shall not improperly recruit, appoint, supervise, evaluate, or provide preferential treatment to a close relative or associate. Where such a relationship exists, the affected person shall withdraw from the relevant decision-making process, and appropriate management measures shall be applied.

Beneficiary Selection and Programme Activities

YPDP staff and associates shall not use their position to improperly benefit family members, friends, or other persons with whom they have a close personal relationship. Where such persons meet legitimate programme eligibility criteria, their participation shall be considered only through established selection procedures and without preferential treatment. Any person involved in beneficiary selection who has a relevant personal relationship shall disclose it and withdraw from the process where necessary.

Financial Transactions and Organizational Resources

No person shall use YPDP funds, assets, information, facilities, or other resources for personal benefit or for the improper benefit of another person or entity. Any financial interest or personal relationship that may affect the approval, authorization, administration, or oversight of a financial transaction shall be disclosed and appropriately managed.

Partnerships and External Relationships

Persons involved in selecting, managing, or evaluating partners, consultants, contractors, or other external entities shall disclose any personal, family, financial, or professional interest or relationship that may influence their impartiality. No person shall use their position to provide improper preferential treatment or secure an undue advantage for a related person or entity.

Gifts, Benefits and Hospitality

Gifts, favours, loans, services, hospitality, or other benefits received from persons or organizations that have, or seek to have, a relationship with YPDP may create an actual, potential, or perceived conflict of interest. Any benefit that could influence, or reasonably appear to influence, an organizational decision shall be disclosed to the appropriate authority and managed in accordance with this Policy and other applicable YPDP policies and procedures.

13. CONFIDENTIALITY AND PROTECTION OF INFORMATION

All information relating to actual, potential, or perceived conflicts of interest shall be handled with appropriate confidentiality and discretion. Information contained in conflict-of-interest declarations, disclosure forms, reports, assessments, registers, meeting records, and supporting documentation shall be shared only with persons who have a legitimate need to access the information for the purpose of assessing, managing, monitoring, or resolving the conflict.

YPDP shall take reasonable measures to protect personal and confidential information obtained under this Policy from unauthorized access, disclosure, misuse, loss, or alteration. Records relating to conflicts of interest shall be securely maintained in accordance with YPDP's applicable document management, confidentiality, and data protection requirements.

Confidentiality shall not prevent YPDP from disclosing information where such disclosure is authorized under organizational procedures, required for a legitimate organizational purpose, required by applicable law, or necessary for addressing suspected fraud, corruption, serious misconduct, or other matters requiring referral to an appropriate authority.

All persons involved in receiving, assessing, or managing conflict-of-interest matters shall maintain confidentiality and shall not use information obtained through the process for personal benefit or any purpose unrelated to their official responsibilities.

14. RECORD-KEEPING AND CONFLICT OF INTEREST REGISTER

YPDP shall maintain appropriate and secure records of all formally declared, identified, assessed, and managed conflicts of interest. Proper record-keeping shall support transparency, accountability, consistent decision-making, and effective monitoring of conflicts of interest across the organization.

- a. Conflict of Interest Records:** Where a conflict of interest is disclosed, assessed, or formally discussed, YPDP shall maintain an appropriate record of the matter. Such records may include Conflict of Interest Declaration Forms, disclosure reports, assessment records, decisions, agreed management or mitigation measures, follow-up actions, and relevant supporting documentation.

Where a conflict is considered during a Board, committee, management, or other formal meeting, the disclosure and any decision regarding the person's participation or recusal shall be appropriately recorded in the relevant minutes or decision records. Where necessary, sensitive details may be maintained separately as confidential or restricted documentation.

- b. Conflict of Interest Register:** YPDP shall maintain a Conflict of Interest Register as an official organizational record of declared and identified conflicts. The Register shall be maintained securely by the designated custodian of this Policy and reviewed periodically to identify recurring risks, patterns, or areas requiring additional management attention.
- c. Conflict of Interest Register:** YPDP shall maintain a Conflict of Interest Register as an official organizational record of declared and identified conflicts.

The Register shall, at a minimum, contain the following information:

- i. Name of the person making the declaration;
- ii. Position, role, or relationship with YPDP;
- iii. Date of declaration or identification of the conflict;
- iv. Description and nature of the interest or conflict;
- v. Whether the interest is current, potential, or has ceased;
- vi. Details of any person or entity closely connected to the individual, where relevant;
- vii. The activity, decision, transaction, or organizational process affected;
- viii. The person or authority responsible for assessing the conflict;

- ix. The agreed management, mitigation, or resolution measures;
- x. Date of review or resolution; and
- xi. Any follow-up action required.

The Register shall be maintained securely by the designated custodian of this Policy and reviewed periodically to identify recurring risks, patterns, or areas requiring additional management attention.

d. Access, Security and Retention: All conflict-of-interest records and the Conflict of Interest Register shall be treated as confidential organizational records and accessed only by authorized persons with a legitimate need to know. Records shall be securely stored and maintained in accordance with YPDP's applicable document management, confidentiality, data protection, and record-retention requirements.

The detailed Conflict of Interest Register template shall be provided in the Annex to this Policy.

15. POLICY IMPLEMENTATION CHECKLIST

Effective implementation of this Policy requires that all persons covered by it are informed of its requirements and understand their responsibilities. The following checklist shall guide the implementation of this Policy:

Implementation Requirement	Status/Verification
Policy Communication and Availability	
The approved Policy has been communicated and made available to all Board members, staff, volunteers, interns, consultants, and other relevant persons covered by the Policy.	☐
New or revised versions of the Policy are formally communicated to all relevant persons.	☐
The Policy is made available through appropriate organizational communication channels and accessible to persons required to comply with it.	☐
New staff and other relevant persons are informed of the Policy as part of their orientation or induction, where applicable.	☐

Understanding and Training	
A responsible person or office has been assigned to support the implementation and administration of the Policy.	☐
Relevant persons receive appropriate orientation, guidance, or training on conflict-of-interest requirements and reporting procedures.	☐
Training and orientation records, including attendance records where applicable, are maintained.	☐
Persons covered by the Policy are given an opportunity to seek clarification or guidance regarding its application.	☐
Feedback or other appropriate measures are used to assess understanding and identify areas requiring further guidance or training.	☐
Declaration and Compliance	
Relevant persons complete Conflict of Interest Declarations upon appointment, engagement, or at other required intervals.	☐
Annual Conflict of Interest Declarations are obtained from Board members, staff, and other designated persons.	☐
Declared conflicts are assessed, documented, and managed in accordance with this Policy.	☐
The Conflict of Interest Register is established, securely maintained, and updated as required.	☐
Compliance with agreed conflict-management measures is monitored by the responsible manager or authorized person.	☐
Leadership and Enforcement	
The Board of Directors, Executive Director, senior management, and line managers demonstrate and promote compliance with this Policy.	☐
Senior management monitors implementation and takes appropriate action where non-compliance is identified.	☐
Serious or high-risk conflicts are reported and escalated in accordance with the procedures established under this Policy.	☐

Review and Continuous Improvement	
Implementation challenges, recurring conflicts, and emerging risks are periodically reviewed.	☐
Additional guidance, training, or corrective measures are introduced where weaknesses or gaps are identified.	☐
The Policy and its implementation arrangements are reviewed in accordance with YPDP's approved policy review cycle.	☐

Implementation Responsibility

The Executive Director shall oversee the implementation of this Policy, with support from senior management and other designated responsible persons. All persons covered by the Policy share responsibility for complying with its requirements and supporting its effective implementation.

16. REPORTING, MONITORING AND COMPLIANCE

YPDP shall maintain appropriate mechanisms for reporting, monitoring, and promoting compliance with this Policy. These mechanisms shall support the timely identification and management of conflicts of interest and help ensure that agreed measures are effectively implemented.

a. Reporting

Conflicts of interest shall be reported through the disclosure and escalation procedures established under this Policy. Relevant managers and authorized persons shall ensure that disclosures received are appropriately assessed, documented, and managed. Serious or high-risk conflicts shall be escalated to the appropriate authority in accordance with Section 11 of this Policy.

b. Monitoring

The relevant manager or authorized person shall monitor compliance with any management or mitigation measures established in relation to a declared conflict of interest. Monitoring may include reviewing whether required recusals have been observed, whether responsibilities have been appropriately reassigned, and whether other agreed measures remain effective. The Conflict of Interest Register and related records shall be reviewed periodically to identify recurring conflicts, patterns, emerging risks, or areas requiring additional guidance, controls, or management action.

c. Compliance

All persons covered by this Policy are responsible for complying with its provisions, including the requirements for disclosure, declaration, recusal, confidentiality, and adherence to agreed management measures. Senior management shall support and promote compliance within their respective areas of responsibility and take appropriate action where non-compliance is identified. Failure to comply with this Policy may result in corrective or disciplinary action in accordance with YPDP's applicable policies, procedures, contractual arrangements, and relevant legal requirements.

d. Management Reporting

Where appropriate, information on the implementation of this Policy, including significant conflicts, compliance concerns, recurring risks, and emerging trends, shall be reported to senior management or the Board of Directors. Such reporting shall respect applicable confidentiality and data protection requirements.

17. CONSEQUENCES OF NON-COMPLIANCE

Compliance with this Policy is mandatory for all persons covered by its provisions. Failure to comply with the requirements of this Policy, including the failure to disclose an actual, potential, or perceived conflict of interest, may undermine the integrity of YPDP's decisions and processes and expose the organization to operational, financial, legal, and reputational risks.

Non-compliance may include, but is not limited to:

- a. Failure to disclose a conflict of interest promptly or accurately;
- b. Providing false, misleading, or incomplete information in a declaration or disclosure;
- c. Participating in discussions, decisions, evaluations, approvals, or transactions despite a requirement to recuse oneself;
- d. Failing to comply with agreed measures for managing or mitigating a conflict of interest;
- e. Using one's position, authority, organizational resources, confidential information, or association with YPDP for improper personal benefit or for the benefit of another person or entity; and
- f. Deliberately concealing, attempting to influence, or otherwise improperly interfering with the assessment or management of a conflict of interest.

Where non-compliance is identified, YPDP shall assess the circumstances and take appropriate action based on the nature, seriousness, and impact of the breach. Actions may include corrective measures, additional supervision or training, reassignment of responsibilities, withdrawal from relevant duties or decisions, disciplinary action, suspension or termination of employment or engagement, termination of contractual arrangements, recovery of improperly obtained benefits where applicable, or referral to relevant authorities where required by law or warranted by the circumstances.

All allegations or suspected breaches shall be assessed fairly and in accordance with applicable YPDP policies, procedures, contractual arrangements, and relevant legal requirements.

18. POLICY IMPLEMENTATION, REVIEW AND AMENDMENT

a. Policy Implementation

- i. The Executive Director shall oversee the implementation of this Policy, with support from the Board of Directors, senior management, line managers, and other designated responsible persons. YPDP shall take appropriate measures to ensure that all persons covered by the Policy are informed of its requirements and understand their responsibilities.
- ii. Implementation measures shall include the communication and dissemination of the Policy, orientation and training where appropriate, completion of required Conflict of Interest Declarations, maintenance of the Conflict of Interest Register, and the establishment of appropriate mechanisms for disclosure, assessment, management, monitoring, and reporting.
- iii. The detailed Policy Implementation Checklist provided under this Policy shall serve as a practical guide for supporting and monitoring its effective implementation.

b. Policy Review

- i. This Policy shall be reviewed at least once every two (2) years or earlier where necessary to ensure that it remains relevant, effective, and appropriate to YPDP's governance, operations, and risk environment.

- ii. An earlier review may be undertaken where there are significant changes in YPDP's structure or operations, applicable legal or regulatory requirements, organizational policies or procedures, or where implementation experience identifies significant gaps, weaknesses, or emerging conflict-of-interest risks.

c. Policy Amendment

- i. Any amendment to this Policy shall be proposed and reviewed through YPDP's established policy development and governance procedures. Material amendments shall be submitted to the YPDP Board of Directors for review and approval.
- ii. Once approved, any revised version of the Policy shall be formally communicated to all relevant persons. The Document Control section shall be updated to reflect the revised version, effective date, and next review date, as applicable.

18. GENERAL PROVISIONS

- a. The existence of an actual, potential, or perceived conflict of interest does not, in itself, constitute misconduct or wrongdoing. Conflicts of interest may arise in the normal course of professional and organizational activities. The key requirement is that such conflicts are identified, disclosed promptly, assessed appropriately, and effectively managed in accordance with this Policy.
- b. Disclosure of a conflict of interest shall therefore not automatically result in disciplinary action or exclusion from YPDP activities. Appropriate action shall depend on the nature and seriousness of the conflict, the risks involved, and the measures necessary to protect the integrity of YPDP's decisions, operations, and reputation.
- c. All persons covered by this Policy are expected to act in good faith and to seek guidance where they are uncertain whether a particular interest, relationship, activity, or circumstance may create a conflict of interest. Where doubt exists, the individual should disclose the matter to the appropriate manager or authority for assessment.
- d. Nothing in this Policy shall prevent YPDP from applying stricter requirements contained in applicable laws, contractual obligations, donor requirements, or other approved YPDP policies and procedures. In the event of any inconsistency, the applicable legal requirements and approved organizational procedures shall prevail to the extent required.

ANNEXES

Annex 1: Conflict Of Interest Declaration Form

Youth Projects Development Platform (YPDP)

Conflict of Interest Declaration Form

Instructions: This form shall be completed by persons required to make a declaration under the YPDP Conflict of Interest Policy. Please provide complete and accurate information. Where no interest exists under a particular category, indicate “**None.**” If additional space is required, please attach a separate sheet.

A. Declarant Information

Item	Details
Full Name	
Position/Role	
Department/Project, if applicable	
Relationship with YPDP	☐ Board Member ☐ Staff ☐ Volunteer ☐ Intern ☐ Consultant ☐ Contractor ☐ Other: _____
Date of Declaration	

B. Declaration of Interests

Please declare any actual, potential, or perceived conflict of interest that applies to you or, where relevant, to a close relative, family member, business associate, or other closely connected person or entity.

No.	Category of Interest	Details of Interest or Relationship	Does it relate to you or a closely connected person/entity?	Current, Potential or Ceased?
1.	External Employment,	Please provide details of any employment, consultancy,		

	Business or Consultancy Activities	business activity, assignment, or other engagement outside YPDP that may create a conflict of interest.		
2.	Appointments and Positions Held	Please provide details of any voluntary or paid appointments, trusteeships, directorships, committee memberships, leadership positions, or other roles held outside YPDP.		
3.	Professional, Political, Religious or Other Affiliations	Please provide details of memberships or affiliations that may create an actual, potential, or perceived conflict with your responsibilities to YPDP.		
4.	Financial Interests and Investments	Please provide details of ownership, investments, partnerships, major shareholdings, beneficial interests, or other financial interests that may relate to YPDP's activities or decisions.		
5.	Family and Close Personal Relationships	Please provide details of any family or close personal relationship that may affect, or appear to affect, your duties, decisions, supervision, recruitment, procurement,		

		beneficiary selection, or other YPDP processes.		
6.	Gifts, Benefits and Hospitality	Please provide details of gifts, hospitality, services, favours, loans, donations, or other benefits offered or received from persons or organizations that have, or seek to have, a relationship with YPDP during the past twelve months. Indicate whether the benefit was accepted or declined.		
7.	Relationships with Beneficiaries or Programme Participants	Please provide details of any relationship or circumstance involving a YPDP beneficiary or programme participant that may create an actual, potential, or perceived conflict of interest.		
8.	Contractual or Business Relationships	Please provide details of any contractual, business, or other financial relationship with a person or entity that has, or seeks to have, a contractual, procurement, partnership, or other business relationship with YPDP.		
9.	Other Interests or Conflicts	Please provide details of any other interest, relationship, activity, or circumstance not		

		covered above that may create, or reasonably appear to create, a conflict of interest.		
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C. Declaration

I, _____, declare that the information provided in this form is true, complete, and accurate to the best of my knowledge.

I understand that I have a continuing obligation to promptly disclose any new actual, potential, or perceived conflict of interest, or any material change in the information provided above, in accordance with the YPDP Conflict of Interest Policy.

I understand that the existence of a conflict of interest does not necessarily constitute wrongdoing; however, failure to disclose or comply with agreed measures for managing a conflict may constitute non-compliance with the Policy.

I consent to the information provided in this declaration being used, recorded, stored, and accessed for the purposes of identifying, assessing, managing, monitoring, and resolving conflicts of interest in accordance with the YPDP Conflict of Interest Policy and applicable organizational procedures.

Declarant's Name	Signature	Date

D. For Official Use Only

Item	Details
Date Received	
Received By	
Conflict Identified	☐ Actual ☐ Potential ☐ Perceived ☐ No Conflict Identified
Assessment Outcome	
Management/Mitigation Measures Required	

Recusal Required	☐ Yes ☐ No
Responsible Person for Follow-Up	
Date for Review, if applicable	
Recorded in Conflict of Interest Register	☐ Yes ☐ No
Authorized By	
Signature	
Date	



YOUTH PROJECTS DEVELOPMENT PLATFORM

A Platform For Change