

- **Burmese Community Development Collaboration (BCDC)**

CONFLICT OF INTEREST **POLICY**

Version 2.0

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Table of Contents

1. Introduction	4
2. Purpose of the Policy	5
3. Organisational Commitment	6
4. Scope and Application	7
5. Definitions	8
6. Types of Conflicts of Interest	9
7. Principles of Ethical Decision-Making	10
8. Disclosure of Conflicts of Interest	11
9. Management of Conflicts of Interest	12
10. Board and Governance Responsibilities	13

11. Recruitment, Procurement, and Financial Conflicts	14
12. Partner, Contractor, and Third-Party Conflicts	15
13. Safeguarding-Related Conflicts of Interest	16
14. Gifts, Benefits, and Hospitality	17
15. Record Keeping and Conflict Register	18
16. Breaches and Non-Compliance	19
17. Responsibilities	20
18. Monitoring and Review	22
19. Related Policies and Procedures	23
20. Review and Update Process	24
21. Appendices	25

1. Introduction

The Burmese Community Development Collaboration (BCDC) is committed to maintaining ethical, transparent, accountable, and impartial governance and operational practices across all organisational activities, partnerships, decision-making processes, and community engagement activities.

BCDC recognises that conflicts of interest may arise where personal, financial, professional, family, political, community, or other interests could improperly influence, or appear to influence, organisational judgement, decision-making, safeguarding responsibilities, procurement processes, governance oversight, or operational integrity.

The organisation further recognises that unmanaged conflicts of interest may:

- Undermine public trust and organisational credibility;
- Affect fair and impartial decision-making;
- Create safeguarding or protection risks;
- Compromise procurement or recruitment integrity;
- Damage donor, community, or stakeholder confidence;
- Create legal, financial, operational, or reputational risks.

This policy establishes the principles, standards, responsibilities, and procedures for identifying, disclosing, recording, assessing, and managing actual, potential, or perceived conflicts of interest within BCDC.

The policy supports:

- Ethical governance and accountability;
- Transparent organisational decision-making;
- Fair procurement and recruitment practices;
- Responsible safeguarding and risk management;
- Prevention of corruption, favouritism, or improper influence;
- Compliance with ACFID Code of Conduct expectations and good governance standards.

2. Purpose of the Policy

The purpose of this policy is to:

- Promote ethical and transparent organisational practices;
- Protect the integrity and independence of organisational decisions;
- Support fair and impartial governance processes;
- Prevent conflicts from improperly influencing organisational activities;
- Strengthen safeguarding and accountability systems;
- Support responsible financial and procurement practices;
- Reduce risks of corruption, favouritism, abuse of authority, or misconduct.

This policy also seeks to:

- Encourage early disclosure of conflicts of interest;
- Provide clear guidance for managing conflicts appropriately;
- Promote accountability and responsible leadership;
- Protect organisational trust and credibility.

3. Organisational Commitment

BCDC is committed to:

- Acting honestly, ethically, and transparently;
- Maintaining fair and objective decision-making processes;
- Promoting accountability and responsible governance;
- Preventing improper influence in organisational activities;
- Managing conflicts of interest proactively and responsibly;
- Supporting safeguarding-informed governance practices;
- Protecting public confidence and organisational integrity.

The organisation recognises that conflicts of interest are not always inappropriate or unethical in themselves. However, conflicts that are not disclosed or properly managed may create serious governance, safeguarding, financial, operational, or reputational risks.

BCDC expects all individuals associated with the organisation to:

- Identify and disclose relevant conflicts promptly;
- Act in the best interests of the organisation and communities served;
- Avoid situations involving improper personal benefit or influence;
- Support ethical and accountable organisational culture.

4. Scope and Application

This policy applies to:

- Board members;
- Employees and staff;
- Volunteers and interns;
- Contractors and consultants;
- Partner representatives;
- Community workers and facilitators;
- Procurement and recruitment personnel;
- Individuals involved in organisational decision-making processes.

This policy applies across:

- Governance activities;
- Recruitment and employment processes;
- Procurement and purchasing;
- Financial management;
- Partnership arrangements;
- Grant and funding activities;
- Safeguarding and community engagement activities;
- Operational and program decision-making processes.

This policy applies to:

- Actual conflicts of interest;
- Potential conflicts of interest;
- Perceived conflicts of interest.

The policy applies regardless of whether the conflict results in improper conduct or actual harm.

5. Definitions

Conflict of Interest

A conflict of interest occurs where personal, financial, family, professional, political, community, or other interests may improperly influence, or appear to influence, a person's judgement, decisions, responsibilities, or actions within BCDC activities or operations.

Actual Conflict of Interest

An actual conflict of interest exists where a person's interests directly conflict with their organisational responsibilities or decision-making obligations.

Potential Conflict of Interest

A potential conflict of interest exists where circumstances may develop into a conflict in the future if not appropriately disclosed or managed.

Perceived Conflict of Interest

A perceived conflict of interest exists where others may reasonably believe that a person's interests could improperly influence organisational decisions or conduct, even if no actual conflict exists.

Personal Interest

Personal interest refers to any financial, family, personal, professional, political, community, or relational interest that may affect, or appear to affect, impartial decision-making or organisational responsibilities.

Related Party

A related party may include family members, close associates, business partners, organisations, contractors, or individuals with whom a person has a significant personal, financial, or professional relationship.

Improper Benefit

Improper benefit refers to personal advantage, financial gain, preferential treatment, influence, or other benefit obtained through misuse of organisational position, authority, relationships, or decision-making processes.

6. Types of Conflicts of Interest

Conflicts of interest may arise in various organisational, governance, operational, financial, safeguarding, procurement, recruitment, or partnership activities. Conflicts may be actual, potential, or perceived and may affect public trust, accountability, impartiality, or organisational integrity if not appropriately managed.

Examples of conflicts of interest may include:

- Recruitment involving family members, close associates, or related parties;
- Procurement or purchasing involving businesses connected to personnel or Board members;
- Financial decisions benefiting related individuals or organisations;
- Acceptance of inappropriate gifts, benefits, or hospitality;
- Personal relationships affecting professional judgement or supervision;
- Participation in organisational decisions where personal interests exist;
- Misuse of organisational information, influence, or opportunities for personal benefit;
- Partner or contractor relationships involving preferential treatment;
- Safeguarding concerns involving personal relationships, authority, or power imbalances;
- Community, political, or external affiliations affecting organisational neutrality or objectivity.

Conflicts of interest may involve:

- Financial interests;
- Personal or family interests;
- Professional or business interests;
- Community or political affiliations;
- Relational or safeguarding-related concerns;
- Governance or operational influence.

BCDC recognises that conflicts of interest are not always unethical or inappropriate by themselves. However, conflicts that are not disclosed, recorded, assessed, or managed appropriately may create serious governance, safeguarding, financial, operational, or reputational risks.

7. Principles of Ethical Decision-Making

BCDC is committed to promoting ethical, transparent, accountable, and impartial decision-making across all organisational activities and governance processes.

Individuals associated with BCDC are expected to:

- Act honestly, responsibly, and in the best interests of the organisation and communities served;
- Avoid improper influence, favouritism, or misuse of authority;
- Make decisions fairly, objectively, and without personal bias;
- Support safeguarding-informed and accountable governance practices;
- Protect organisational integrity, credibility, and public trust.

Ethical decision-making within BCDC should be guided by principles including:

- Transparency and accountability;
- Fairness and impartiality;
- Integrity and honesty;
- Respect for safeguarding and protection obligations;
- Responsible stewardship of organisational resources;
- Prevention of corruption, exploitation, or abuse of power;
- Compliance with organisational policies and legal obligations.

Where conflicts of interest arise, individuals are expected to:

- Disclose conflicts promptly;
- Avoid participating in inappropriate decision-making processes;
- Cooperate with conflict management measures;
- Prioritise organisational and community interests over personal interests.

BCDC recognises that ethical governance and conflict management are essential to maintaining donor confidence, community trust, safeguarding standards, and responsible organisational leadership.

8. Disclosure of Conflicts of Interest

All individuals associated with BCDC are expected to disclose actual, potential, or perceived conflicts of interest as early as possible.

Disclosure supports:

- Ethical and transparent governance;
- Fair and accountable decision-making;
- Safeguarding and protection obligations;
- Prevention of improper influence or misconduct;
- Protection of organisational credibility and trust.

Conflicts of interest should be disclosed where a person believes that:

- Their interests may affect organisational decisions or responsibilities;
- Others may reasonably perceive a conflict exists;
- Personal relationships or interests may influence impartiality;
- Safeguarding, procurement, recruitment, financial, or governance risks may arise.

Disclosures may relate to:

- Financial or business interests;
- Family or personal relationships;
- Employment or consultancy arrangements;
- Partner or contractor relationships;
- Gifts, benefits, or hospitality;
- Political, community, or external affiliations;
- Safeguarding or protection-related concerns.

Disclosures should:

- Be made promptly and honestly;
- Include relevant information regarding the nature of the conflict;
- Be recorded appropriately where required;
- Be managed confidentially and responsibly.

BCDC encourages individuals to seek guidance where uncertainty exists regarding whether a conflict should be disclosed.

Failure to disclose relevant conflicts of interest may constitute misconduct and may result in disciplinary, contractual, governance, or corrective action.

9. Management of Conflicts of Interest

BCDC is committed to managing conflicts of interest fairly, transparently, proportionately, and responsibly.

Following disclosure, conflicts of interest may be:

- Assessed for risk and significance;
- Recorded in organisational conflict registers where appropriate;
- Reviewed by authorised personnel or governance representatives;
- Managed through proportionate mitigation measures.

Management measures may include:

- Restricting involvement in decision-making processes;
- Withdrawal from meetings or discussions;
- Independent review or oversight arrangements;
- Additional governance or safeguarding supervision;
- Temporary reassignment of responsibilities;
- Procurement or recruitment controls;
- Monitoring or documentation requirements.

In some situations, conflicts of interest may be:

- Acceptable with appropriate management measures;
- Too significant to permit continued involvement in particular activities or decisions;
- Referred to governance oversight processes for further review.

BCDC will seek to ensure that conflict management processes:

- Protect organisational integrity;
- Support fair and objective decision-making;
- Reduce safeguarding, operational, financial, or reputational risks;
- Prevent improper personal benefit or influence;
- Maintain accountability and public confidence.

All individuals involved in conflict management processes are expected to:

- Cooperate honestly and responsibly;
- Respect confidentiality obligations;
- Follow organisational decisions and mitigation measures;
- Avoid retaliatory or inappropriate behaviour.

10. Board and Governance Responsibilities

The BCDC Board and governance leadership play an important role in supporting ethical governance, accountability, transparency, and appropriate conflict of interest management.

The Board is responsible for:

- Supporting implementation of this policy;
- Promoting ethical organisational culture and governance;
- Monitoring significant governance or integrity risks;
- Supporting fair and transparent decision-making processes;
- Ensuring appropriate conflict disclosure and management practices are maintained.

Board members are expected to:

- Disclose actual, potential, or perceived conflicts of interest promptly;
- Avoid participating in decisions where conflicts exist;
- Act in the best interests of BCDC and communities served;
- Support safeguarding-informed and accountable governance practices;
- Avoid misuse of authority, influence, or confidential information.

Where Board-related conflicts arise, BCDC may:

- Record disclosures in governance records or registers;
- Require withdrawal from discussions or voting processes;
- Implement additional oversight or independent review measures;
- Apply governance controls proportionate to identified risks.

BCDC recognises that strong governance and effective conflict management are essential to:

- Maintaining donor and stakeholder confidence;
- Protecting organisational credibility and integrity;
- Supporting safeguarding and accountability systems;
- Preventing corruption, favouritism, or abuse of authority;
- Strengthening ethical leadership and responsible governance practices.

11. Recruitment, Procurement, and Financial Conflicts

BCDC recognises that recruitment, procurement, financial management, purchasing, contracting, and resource allocation processes may create heightened risks of conflicts of interest, favouritism, corruption, improper influence, or misuse of organisational resources if not managed appropriately.

All recruitment, procurement, and financial processes should be conducted:

- Fairly and transparently;
- In accordance with organisational procedures;
- Without improper personal influence or benefit;
- With appropriate accountability and oversight measures.

Conflicts of interest may arise where individuals:

- Participate in recruitment involving family members, close associates, or related parties;
- Influence procurement decisions involving connected businesses or suppliers;
- Approve payments or financial transactions involving personal interests;
- Use organisational resources for personal benefit;
- Influence funding or grant decisions improperly;
- Receive inappropriate financial benefits or preferential treatment.

Individuals involved in recruitment, procurement, or financial processes are expected to:

- Disclose relevant conflicts promptly;
- Avoid participating in conflicted decision-making processes;
- Follow procurement and financial procedures;
- Support fair competition and transparent processes;
- Protect organisational integrity and accountability.

BCDC may implement conflict management measures including:

- Independent review or oversight;
- Procurement controls and approvals;
- Segregation of duties;
- Restricted decision-making participation;
- Additional governance monitoring;
- Documentation and conflict recording requirements.

Failure to disclose or appropriately manage recruitment, procurement, or financial conflicts may constitute misconduct and may result in disciplinary, contractual, governance, or corrective action.

12. Partner, Contractor, and Third-Party Conflicts

BCDC recognises that conflicts of interest may also arise in relationships involving:

- Partner organisations;
- Contractors and consultants;
- Suppliers and vendors;
- Service providers;
- Funding or implementation partners;
- Community representatives or external stakeholders.

Partner and third-party conflicts may involve:

- Financial or business interests;
- Family or personal relationships;
- Preferential treatment;
- Procurement or contracting influence;
- Political or community affiliations;
- Safeguarding or operational risks;
- Improper influence over organisational decisions.

BCDC expects partners, contractors, consultants, and third parties engaged with the organisation to:

- Act ethically and transparently;
- Disclose relevant conflicts of interest promptly;
- Respect safeguarding and accountability obligations;
- Avoid improper influence or misuse of organisational relationships;
- Cooperate with conflict management processes where required.

The organisation may:

- Conduct due diligence or conflict assessments;
- Require disclosure forms or declarations;
- Apply procurement or governance controls;
- Restrict involvement in specific decisions or activities;
- Review or terminate partnerships or contracts where serious unmanaged conflicts exist.

BCDC recognises that unmanaged partner or third-party conflicts may:

- Affect safeguarding outcomes;
- Damage public trust and donor confidence;
- Create operational or reputational risks;
- Undermine organisational integrity and accountability.

13. Safeguarding-Related Conflicts of Interest

BCDC recognises that safeguarding-related conflicts of interest may create serious risks involving:

- Abuse of power or authority;
- Failure to report safeguarding concerns;
- Bias in safeguarding assessments or investigations;
- Protection failures involving children or vulnerable individuals;
- Inappropriate personal relationships or influence;
- Retaliation or intimidation relating to safeguarding disclosures.

Safeguarding-related conflicts may arise where individuals:

- Have personal relationships with affected individuals;
- Have supervisory authority over related persons;
- Are involved in safeguarding investigations concerning associates or colleagues;
- May benefit from non-disclosure or improper handling of safeguarding concerns;
- Have competing personal, operational, or reputational interests.

All safeguarding-related conflicts of interest must be:

- Disclosed promptly;
- Managed sensitively and responsibly;
- Escalated where appropriate;
- Addressed using safeguarding-informed approaches.

BCDC may implement measures including:

- Independent safeguarding review;
- Restricted involvement in investigations or decisions;
- External safeguarding consultation;
- Additional oversight or supervision;
- Protection and confidentiality measures;
- Survivor-centred and do-no-harm approaches.

The organisation recognises that safeguarding integrity, impartiality, and protection from harm must remain the highest priority in all safeguarding-related conflict management processes.

14. Gifts, Benefits, and Hospitality

BCDC recognises that gifts, benefits, hospitality, favours, or other advantages may create actual, potential, or perceived conflicts of interest if not managed appropriately.

Personnel associated with BCDC are expected to:

- Avoid accepting inappropriate gifts or benefits;
- Avoid situations involving improper influence or obligation;
- Exercise ethical judgement and transparency;
- Protect organisational integrity and impartiality.

Conflicts may arise where gifts, benefits, or hospitality:

- Influence decision-making or procurement processes;
- Create expectations of preferential treatment;
- Affect recruitment or partnership decisions;
- Compromise safeguarding or governance obligations;
- Create reputational or accountability concerns.

Examples may include:

- Expensive gifts or financial benefits;
- Inappropriate hospitality or entertainment;
- Personal favours connected to organisational decisions;
- Benefits linked to procurement, funding, or contracts;
- Repeated or excessive hospitality arrangements.

BCDC may:

- Require disclosure of gifts or benefits;
- Maintain gifts and hospitality registers;
- Restrict acceptance of certain benefits;
- Require return or refusal of inappropriate gifts;
- Implement additional oversight or governance measures.

Any gifts, benefits, or hospitality that may compromise, or appear to compromise, impartiality, safeguarding obligations, accountability, or organisational integrity should be declined or disclosed promptly.

15. Record Keeping and Conflict Register

BCDC is committed to maintaining appropriate records relating to:

- Conflict of interest disclosures;
- Conflict assessments;
- Management and mitigation measures;
- Governance decisions;
- Procurement or recruitment conflict reviews;
- Gifts, benefits, or hospitality disclosures.

Where appropriate, conflicts of interest may be recorded in:

- Conflict of Interest Registers;
- Governance records;
- Board meeting minutes;
- Procurement or recruitment documentation;
- Risk management or safeguarding records.

Conflict records should:

- Be accurate and appropriately documented;
- Be maintained securely and confidentially;
- Be accessible only to authorised personnel;
- Support governance transparency and accountability;
- Be retained in accordance with organisational procedures.

The organisation recognises that appropriate documentation and record keeping supports:

- Ethical governance;
- Transparency and accountability;
- Safeguarding and risk management;
- Prevention of corruption or favouritism;
- Monitoring and oversight processes;
- Organisational learning and continuous improvement.

BCDC may periodically review conflict registers and related records to:

- Monitor governance risks;
- Identify recurring or emerging concerns;
- Strengthen organisational controls;
- Support accountability and compliance obligations.

16. Breaches and Non-Compliance

BCDC recognises that failure to disclose, manage, or comply with conflict of interest obligations may create significant governance, safeguarding, operational, financial, legal, or reputational risks.

Breaches of this policy may include:

- Failure to disclose actual, potential, or perceived conflicts of interest;
- Participation in decision-making despite identified conflicts;
- Improper influence over recruitment, procurement, financial, or governance processes;
- Misuse of organisational position, authority, or confidential information for personal benefit;
- Acceptance of inappropriate gifts, benefits, or hospitality;
- Deliberate concealment of conflicts of interest;
- Retaliation against individuals who raise conflict-related concerns.

BCDC may respond to breaches through:

- Internal review or investigation;
- Governance oversight processes;
- Conflict mitigation measures;
- Disciplinary or corrective action;
- Restriction of organisational responsibilities or participation;
- Contractual or partnership review;
- Safeguarding or risk management processes where appropriate.

The organisation will seek to ensure that responses to breaches are:

- Fair and proportionate;
- Confidential where appropriate;
- Consistent with organisational procedures;
- Safeguarding-informed where relevant;
- Focused on protecting organisational integrity and accountability.

Serious or repeated breaches may result in:

- Removal from decision-making processes;
- Suspension or termination of employment, volunteer engagement, or contracts;
- Escalation to governance oversight bodies;
- Referral to external authorities where legally required.

17. Responsibilities

All individuals associated with BCDC share responsibility for supporting ethical governance, transparency, accountability, and responsible conflict of interest management.

Board Responsibilities

The Board is responsible for:

- Supporting implementation of this policy;
- Promoting ethical governance and accountability;
- Monitoring significant governance and integrity risks;
- Ensuring appropriate conflict disclosure and management systems are maintained;
- Supporting transparent and impartial organisational decision-making.

Executive Responsibilities

Executive leadership is responsible for:

- Supporting operational implementation of this policy;
- Promoting ethical organisational culture;
- Ensuring appropriate conflict assessment and management processes;
- Supporting governance and safeguarding obligations;
- Maintaining appropriate documentation and oversight processes.

Staff and Volunteer Responsibilities

Staff, volunteers, contractors, consultants, and partner representatives are expected to:

- Disclose conflicts of interest promptly and honestly;
- Avoid improper influence or personal benefit;
- Follow organisational procedures and governance expectations;
- Cooperate with conflict management measures;
- Protect organisational integrity, safeguarding obligations, and accountability systems.

Recruitment, Procurement, and Financial Responsibilities

Personnel involved in recruitment, procurement, financial management, or contracting activities are expected to:

- Maintain impartiality and transparency;
- Avoid favouritism or preferential treatment;
- Disclose relevant conflicts appropriately;
- Follow organisational procurement and financial procedures;
- Support fair and accountable decision-making processes.

Safeguarding Responsibilities

Individuals involved in safeguarding activities are expected to:

- Manage safeguarding-related conflicts responsibly;
- Prioritise protection from harm and safeguarding integrity;
- Avoid inappropriate influence in safeguarding processes;
- Support survivor-centred and do-no-harm approaches where applicable.

18. Monitoring and Review

BCDC recognises that effective conflict of interest management requires ongoing monitoring, oversight, review, and continuous improvement.

The organisation may monitor:

- Conflict disclosure practices;
- Governance and decision-making processes;
- Recruitment and procurement activities;
- Financial and partnership arrangements;
- Safeguarding-related conflict risks;
- Gifts, benefits, and hospitality disclosures;
- Compliance with organisational procedures.

Monitoring activities may include:

- Governance reviews;
- Internal audits or operational reviews;
- Procurement and financial oversight processes;
- Safeguarding monitoring;
- Conflict register reviews;
- Board and management oversight activities.

Findings from monitoring and review activities may support:

- Strengthening governance controls;
- Improving organisational transparency;
- Enhancing safeguarding and accountability systems;
- Reducing corruption, favouritism, or misconduct risks;
- Improving staff and governance awareness;
- Supporting continuous organisational improvement.

BCDC is committed to maintaining governance systems that support ethical leadership, impartial decision-making, safeguarding integrity, and responsible stewardship of organisational resources.

19. Related Policies and Procedures

This policy should be read together with:

- Code of Conduct;
- Risk Management Policy;
- Whistleblowing Policy;
- Financial Wrongdoing Policy;
- Procurement and Financial Procedures;
- Child Safeguarding Policy;
- PSEAH Policy;
- Human Resources Management Policy;
- Privacy Policy;
- Complaint Handling Policy;
- Due Diligence and Partnership Procedures;
- Volunteer Manual;
- Governance and Board procedures where applicable.

These policies collectively support:

- Ethical governance and accountability;
- Safeguarding and protection obligations;
- Prevention of corruption and misconduct;
- Responsible financial and operational management;
- Transparency and organisational integrity;
- Fair and impartial decision-making.

20. Review and Update Process

This policy should be reviewed periodically to ensure that it remains:

- Effective and operationally appropriate;
- Consistent with governance and safeguarding obligations;
- Aligned with ACFID requirements and sector good practice;
- Responsive to emerging organisational and operational risks;
- Supportive of ethical and accountable decision-making.

The policy may be reviewed:

- Annually;
- Following significant governance or integrity concerns;
- Following procurement, safeguarding, or financial incidents;
- Following operational or structural changes;
- Following legal or regulatory developments;
- Following governance or compliance reviews.

The review process may consider:

- Organisational learning and feedback;
- Governance and safeguarding risks;
- Monitoring and audit findings;
- Conflict register trends;
- Emerging sector good practice;
- Operational and accountability needs.

BCDC is committed to continuously strengthening:

- Ethical governance systems;
- Accountability and transparency practices;
- Safeguarding-informed leadership;
- Conflict management processes;
- Responsible and impartial organisational decision-making.

21. Appendices

Appendix A – Conflict of Interest Disclosure Form

Appendix B – Conflict of Interest Register

Appendix C – Gifts, Benefits, and Hospitality Register

Appendix D – Sanctions and Prohibited Entities Screening Record



BURMESE COMMUNITY
DEVELOPMENT COLLABORATION





Appendix A – Conflict of Interest Disclosure Form

Burmese Community Development Collaboration (BCDC)

Conflict of Interest Disclosure Form

Purpose

This form is intended to support the identification, disclosure, assessment, and management of actual, potential, or perceived conflicts of interest in accordance with the BCDC Conflict of Interest Policy.

All individuals associated with BCDC are expected to disclose conflicts of interest promptly, honestly, and responsibly to support:

- Ethical governance;
- Transparency and accountability;
- Fair and impartial decision-making;
- Safeguarding and protection obligations;
- Prevention of improper influence or personal benefit.

Part A – Personal Information

Item	Details
Full Name	
Position / Role	
Department / Program	
Organisation (if partner or contractor)	
Contact Number	
Email Address	
Date of Disclosure	



Part B – Nature of the Conflict of Interest

Please describe the actual, potential, or perceived conflict of interest.

Part C – Type of Conflict

Please tick all relevant categories.

Conflict Type	Tick
Financial Interest	<input type="checkbox"/>
Family or Personal Relationship	<input type="checkbox"/>
Recruitment Conflict	<input type="checkbox"/>
Procurement or Purchasing Conflict	<input type="checkbox"/>
Contractor or Supplier Relationship	<input type="checkbox"/>
Partnership or Third-Party Conflict	<input type="checkbox"/>
Governance or Board Conflict	<input type="checkbox"/>
Safeguarding-Related Conflict	<input type="checkbox"/>
Gifts, Benefits, or Hospitality	<input type="checkbox"/>
Community or Political Affiliation	<input type="checkbox"/>
Employment or Consultancy Interest	<input type="checkbox"/>
Use of Organisational Resources	<input type="checkbox"/>
Other Conflict of Interest	<input type="checkbox"/>

Part D – Details of Related Parties or Interests

Please provide details of any related individuals, organisations, businesses, contractors, suppliers, or personal interests connected to the conflict.



Part E – Organisational Activities Potentially Affected

Please indicate the activities, decisions, or processes that may be affected by the conflict.

Activity or Area	Tick
Recruitment or Employment	
Procurement or Purchasing	
Financial Decision-Making	
Grant or Funding Activities	
Partnership or Contractor Engagement	
Safeguarding or Investigation Process	
Governance or Board Decisions	
Community or Program Activities	
Operational Decision-Making	
Other Organisational Activities	

Part F – Safeguarding and Risk Considerations

Please indicate whether the conflict may involve:

- Safeguarding risks;
- Abuse of authority;
- Power imbalances;
- Financial risks;
- Reputational risks;
- Confidentiality concerns;
- Risks to vulnerable individuals or communities.



Part G – Suggested Management Measures

Please describe any proposed actions or measures that may help manage the conflict appropriately.

Examples may include:

- Withdrawal from decision-making;
- Independent review or oversight;
- Restricted access to information;
- Additional governance supervision;
- Procurement or recruitment controls.

Part H – Declaration

I confirm that:

- The information provided in this disclosure is accurate to the best of my knowledge;
- I understand my obligations under the BCDC Conflict of Interest Policy;
- I will cooperate with any conflict management measures implemented by BCDC;
- I will avoid participating in inappropriate or conflicted decision-making processes where required.

Name	Signature	Date



Part I – Internal Use Only

Item	Details
Disclosure Received By	
Position	
Date Received	
Conflict Classification	Actual / Potential / Perceived
Initial Risk Level	Low / Moderate / High / Critical
Management Actions Required	
Restrictions or Conditions Applied	
Further Review Required	Yes / No
Recorded in Conflict Register	Yes / No
Follow-Up Review Date	

Confidentiality Notice

This document contains confidential organisational and personal information and must be handled securely and confidentially in accordance with BCDC governance, safeguarding, privacy, and record-keeping obligations.



Appendix B – Conflict of Interest Register

Burmese Community Development Collaboration (BCDC)

Conflict of Interest Register

Purpose

This register is used to record, monitor, assess, and manage actual, potential, or perceived conflicts of interest disclosed in accordance with the BCDC Conflict of Interest Policy.

The register supports:

- Ethical governance and accountability;
- Transparency and impartial decision-making;
- Safeguarding and risk management;
- Procurement and financial integrity;
- Organisational oversight and compliance.



Conflict of Interest Register

Ref No.	Date Disclosed	Name / Position	Nature of Conflict	Conflict Type	Organisational Area Affected	Risk Level	Management Measures Implemented	Restrictions Applied	Review Status	Reviewed By	Next Review Date
				Financial / Personal / Procurement / Governance / Safeguarding / Other		Low / Moderate / High / Critical			Open / Ongoing / Closed		
				Financial / Personal / Procurement / Governance / Safeguarding / Other		Low / Moderate / High / Critical			Open / Ongoing / Closed		
				Financial / Personal / Procurement / Governance / Safeguarding / Other		Low / Moderate / High / Critical			Open / Ongoing / Closed		
				Financial / Personal / Procurement / Governance / Safeguarding / Other		Low / Moderate / High / Critical			Open / Ongoing / Closed		
				Financial / Personal / Procurement / Governance / Safeguarding / Other		Low / Moderate / High / Critical			Open / Ongoing / Closed		



Guidance for Completing the Register

Nature of Conflict

Provide a brief description of the disclosed conflict of interest, including relevant relationships, interests, or circumstances.

Conflict Type

Examples may include:

- Financial conflict;
- Personal or family relationship;
- Procurement or purchasing conflict;
- Governance or Board conflict;
- Safeguarding-related conflict;
- Partner or contractor conflict;
- Gifts, benefits, or hospitality concern.

Organisational Area Affected

Examples may include:

- Recruitment;
- Procurement;
- Financial management;



- Safeguarding activities;
- Governance decisions;
- Program implementation;
- Partnership management.

Management Measures Implemented

Examples may include:

- Withdrawal from decision-making;
- Independent review or oversight;
- Procurement controls;
- Restricted access to information;
- Additional governance supervision;
- Safeguarding risk mitigation measures.

Review Status

Examples:

- Open;
- Ongoing Monitoring;
- Closed;
- Escalated for Further Review.



Confidentiality and Access Control

This register contains confidential governance and organisational information and must:

- Be stored securely;
- Be accessible only to authorised personnel;
- Be managed confidentially and responsibly;
- Be reviewed periodically for governance and accountability purposes.

Monitoring and Governance Oversight

BCDC may periodically review the Conflict of Interest Register to:

- Monitor governance and integrity risks;
- Identify recurring conflict patterns;
- Strengthen organisational controls;
- Support safeguarding and accountability obligations;
- Improve governance transparency and operational oversight.



Appendix C – Gifts, Benefits, and Hospitality Register

Burmese Community Development Collaboration (BCDC)

Gifts, Benefits, and Hospitality Register

Purpose

This register is used to record gifts, benefits, hospitality, sponsored activities, or other advantages offered to, accepted by, or declined by individuals associated with BCDC.

The register supports:

- Ethical governance and accountability;
- Transparency and integrity;
- Prevention of improper influence or favouritism;
- Responsible procurement and financial practices;
- Compliance with the BCDC Conflict of Interest Policy.

All gifts, benefits, or hospitality that may create actual, potential, or perceived conflicts of interest should be disclosed appropriately.



Gifts, Benefits, and Hospitality Register

Ref No.	Date	Name / Position	Description of Gift, Benefit, or Hospitality	Offered By	Estimated Value	Purpose or Context	Accepted / Declined	Conflict or Risk Identified	Management Action Taken	Reviewed By	Comments
							Accepted / Declined	Yes / No			
							Accepted / Declined	Yes / No			
							Accepted / Declined	Yes / No			
							Accepted / Declined	Yes / No			
							Accepted / Declined	Yes / No			



Guidance for Completing the Register

Description of Gift, Benefit, or Hospitality

Examples may include:

- Gifts or donated items;
- Meals or entertainment;
- Sponsored travel or accommodation;
- Event invitations;
- Discounts or personal benefits;
- Financial or non-financial advantages.

Offered By

Record the name of the individual, organisation, contractor, supplier, partner, or stakeholder who offered the gift, benefit, or hospitality.

Purpose or Context

Describe the circumstances in which the gift, benefit, or hospitality was offered, including any organisational activities, procurement processes, partnership discussions, or events involved.



Conflict or Risk Identified

Indicate whether the gift, benefit, or hospitality may create:

- Actual conflict of interest;
- Potential conflict of interest;
- Perceived conflict of interest;
- Procurement or safeguarding concerns;
- Reputational or governance risks.

Management Action Taken

Examples may include:

- Disclosure to management or Board;
- Refusal or return of gift;
- Restricted participation in decision-making;
- Additional governance oversight;
- Monitoring or documentation requirements.



Ethical Expectations

Personnel associated with BCDC are expected to:

- Exercise ethical judgement and transparency;
- Avoid accepting inappropriate gifts or benefits;
- Prevent improper influence or favouritism;
- Protect organisational integrity and accountability;
- Disclose gifts, benefits, or hospitality where required.

Gifts, benefits, or hospitality that may compromise impartiality, safeguarding obligations, governance integrity, or public trust should be declined or managed appropriately.

Confidentiality and Record Management

This register contains governance and organisational information and should:

- Be maintained securely;
- Be accessible only to authorised personnel;
- Be reviewed periodically for governance and accountability purposes;
- Be retained in accordance with organisational record-keeping procedures.



Monitoring and Oversight

BCDC may periodically review this register to:

- Monitor governance and integrity risks;
- Identify recurring concerns or patterns;
- Support procurement and safeguarding accountability;
- Strengthen ethical governance practices;
- Reduce risks of corruption, favouritism, or improper influence.



Appendix D – Sanctions and Prohibited Entities Screening Record

**Burmese Community Development Collaboration (BCDC)
Sanctions and Prohibited Entities Screening Record**

Purpose

This record is used to document sanctions screening and prohibited entities checks conducted as part of BCDC's:

- Due diligence processes;
- Partner assessments;
- Procurement and contracting activities;
- Funding and grant assessments;
- Safeguarding and risk management processes;
- Governance and compliance obligations.

The purpose of screening is to help ensure that BCDC does not knowingly engage with, support, fund, partner with, or provide organisational resources to individuals, groups, organisations, or entities that are:

- Subject to sanctions;
- Listed as prohibited entities;
- Associated with terrorism, criminal activity, corruption, trafficking, or serious human rights abuses;
- Inconsistent with BCDC safeguarding, legal, ethical, or accountability obligations.



Screening Record

Ref No.	Date of Screening	Name of Individual / Organisation / Partner	Type of Relationship	Screening Conducted By	Screening Sources Checked	Screening Result	Risk Level	Further Review Required	Approved / Not Approved	Comments
			Partner / Contractor / Supplier / Donor / Other			Cleared / Potential Match / Match Identified	Low / Moderate / High / Critical	Yes / No	Approved / Not Approved	
			Partner / Contractor / Supplier / Donor / Other			Cleared / Potential Match / Match Identified	Low / Moderate / High / Critical	Yes / No	Approved / Not Approved	
			Partner / Contractor / Supplier / Donor / Other			Cleared / Potential Match / Match Identified	Low / Moderate / High / Critical	Yes / No	Approved / Not Approved	
			Partner / Contractor / Supplier / Donor / Other			Cleared / Potential Match / Match Identified	Low / Moderate / High / Critical	Yes / No	Approved / Not Approved	



Examples of Screening Sources

Screening sources may include:

- Australian Government sanctions lists;
- DFAT Consolidated Sanctions List;
- United Nations sanctions lists;
- Relevant prohibited entities lists;
- Regulatory or law enforcement advisories;
- Publicly available governance or compliance information;
- Other appropriate due diligence and risk assessment sources.

BCDC should use screening sources that are:

- Relevant and appropriate;
- Reasonably accessible;
- Consistent with organisational risk and compliance obligations.

Guidance for Completing the Record

Type of Relationship

Examples may include:

- Partner organisation;
- Contractor or consultant;



- Supplier or vendor;
- Donor or funding source;
- Community representative;
- Other operational relationship.

Screening Result

Examples may include:

- Cleared;
- Potential Match Identified;
- Match Confirmed;
- Further Review Required.

Risk Level

Risk levels should consider:

- Governance and safeguarding risks;
- Operational and reputational risks;
- Financial or legal risks;
- Potential links to prohibited activities or entities;
- Reliability of available information.



Further Review and Escalation

Where screening identifies:

- Potential sanctions concerns;
- Possible prohibited entity connections;
- Serious governance or safeguarding risks;
- Unclear or conflicting information;

BCDC may:

- Conduct additional due diligence;
- Escalate the matter to governance oversight;
- Seek legal, safeguarding, or compliance advice;
- Restrict or suspend engagement activities;
- Decline partnerships, procurement, or funding arrangements.

Confidentiality and Record Management

This record contains confidential governance, due diligence, and risk management information and should:

- Be stored securely;
- Be accessible only to authorised personnel;
- Be managed responsibly and confidentially;
- Be retained in accordance with organisational procedures.



Monitoring and Governance Oversight

BCDC may periodically review sanctions and prohibited entities screening records to:

- Strengthen governance and accountability systems;
- Monitor due diligence and compliance practices;
- Support safeguarding and risk management obligations;
- Reduce legal, financial, operational, and reputational risks;
- Strengthen ethical and responsible organisational partnerships.