**Political Asylum/Immigration Representation Project**

**Conflict of Interest Policy**

(reviewed and approved May 2, 2018)

CONFLICT OF INTEREST

1. Purpose of the Policy. Because PAIR is a non-profit, tax-exempt organization, it is required by state and federal laws[[1]](#footnote-1) to have a Conflict of Interest policy that applies to all board members who might have a conflict of interest in dealings with PAIR.[[2]](#footnote-2)
2. Conflict of Interest – Defined: Board members have a duty of loyalty to the mission of PAIR, as it is stated in its governing documents and all actions taken by board members must be consistent with that mission and not for the promotion of individual or personal interests,[[3]](#footnote-3) be they financial or on behalf of any organization whose interests conflicts with PAIR’s mission and governing documents. In furtherance of this policy, it is expected that all board members review PAIR’s governing documents in order for their actions to be consistent with PAIR’s mission. All relevant documents are available for review on PAIR’s website.
3. Annual Certification: Once each year, the President of PAIR will ensure that this Conflicts of Interest Policy is distributed to all Board members. Each Board member will be required to review and acknowledge by e-mail whether any such real or perceived conflicts exist. The completed forms will be reviewed by the Executive Committee of the Board of Directors and anyone with a perceived conflict will be contacted by the President of the Board for further clarification, if needed. To the extent that a conflict is found to exist, the Executive Committee is empowered to find a resolution that, in its view, removes any conflict found to exist that would be to PAIR’s detriment.
4. Periodic Review: To the extent that, in between annual formal certifications, a board member perceives that an activity or intended activity might cause a conflict of interest, s/he is encouraged to contact the President of the Board of Directors to discuss the matter. To the extent that the President of the Board believes that there might be a conflict based on this report, s/he shall convene a meeting of the Executive Committee to discuss the matter and make a determination and resolution as per the procedures outlined in No. 3 above.
5. This policy shall be reviewed annually by the Board of Directors. Any changes to the policy shall be communicated to all Board members.

**Conflict of Interest Disclosure Form**

Date: \_\_\_\_\_\_\_\_\_\_\_\_

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between the PAIR Project and your personal interests, financial or otherwise:

\_\_\_\_\_ I have no conflict of interest to report

\_\_\_\_\_ To the extent that you believe that there may be a conflict in any of the following areas, please describe below:

1. Your financial, business, or personal relationships that give rise to a conflict of interest.
2. Financial, business, or personal relationships of family or household members.
3. Income or benefits from PAIR.
4. Goods, services, or facilities furnished to or from PAIR.
5. Other.

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I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of the PAIR Project.

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Anyone wanting more information concerning the specific federal or state requirements, please contact the President of the Board of Directors, who will provide them to you. [↑](#footnote-ref-1)
2. This policy takes the place of any others that PAIR had in the past and will take effect immediately when approved by the PAIR Board of Directors. [↑](#footnote-ref-2)
3. This is not intended to forbid the activity, but rather to report the activity, either intended or already done so there is full disclosure to PAIR and a review made to determine whether it conflicts with PAIR’s best interests. Such potential conflicts are too numerous to list, but includes using their position at PAIR for personal or private gain, such as accepting gifts, loans, or favors from any person or entity who does or seeks to do business with PAIR, [↑](#footnote-ref-3)