



Turning Tides

Conflict of Interest Policy

September 2024

Purpose

The purpose of this conflict of interest is to protect the interest of Turning Tides when it is contemplating entering a transaction or grantmaking process that might benefit the private interest of staff/contractors/consultants, Steering Committee members and any advisory committee/panel members of Turning Tides or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable local and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Turning Tides' envisioned partner-led grantmaking models will bring together a broad range of individuals to make collective granting decisions. To include experienced and diverse leaders in our grantmaking processes, we expect that there will often be professional, personal and/or financial relationships between Steering and/or advisory committee/panel members and applicant organizations. Potential conflicts of interest are to be expected, and at the same time Turning Tides wishes to limit both actual and perceived conflicts of interest to ensure fairness for all. Therefore, the Steering Committee, advisory committees/panels and team members (staff/contractors) shall adhere to this Conflict of Interest Policy.

Definition of "Interest"

"Interest" in an organization could be in one of three areas: professional, financial or Personal. This applies equally to Turning Tides team members (staff/contractors), Steering Committee members, and future advisory committee/panel members. "Interest" is not necessarily "conflict of interest."

Professional Interest

- Anyone who is on the board, staff or is an active consultant in the organization.
- Anyone with a political alliance or in a coalition or partnership with the organization.

Financial Interest

- Anyone who has been or is an active major donor of the organization in the last three years or has a vested financial interest in the organization.
- Anyone who would personally receive any of the grant funds by virtue of a staff or consultant relationship with the organization (including through a family member).
- Anyone who has ownership or investment interest in, or compensation arrangement(s) with, any entity or individual with which the organization is negotiating. "Compensation" includes direct and indirect remuneration as well as gifts of favors that are more than insubstantial.

Personal Interest

- Anyone with a current personal relationship with a staff or board member of the organization (e.g. partner, spouse, or significant other).
- Anyone with a family member working for the organization.



- Anyone with a personal conflict with staff of the organization.

Definition of “Conflict of Interest”

Automatic Conflict of Interest

Turning Tides Steering Committee members, advisory committee/panel members and team members (staff/contractors) are automatically considered to have a conflict of interest with an organization if any of the following apply:

- They are a board member of the organization.
- They are a staff member or consultant of the organization.
- They would personally receive any of the grant funds by virtue of their role with the organization.
- They are the partner, spouse, or significant other of any of the above.

Personally Acknowledged Conflict of Interest

Turning Tides Steering Committee members, advisory committee/panel members and/or team members (staff/contractors) may decide that an “interest” (professional, financial, or personal – see above) in an organization causes a “conflict of interest” if they acknowledge that their interest in the organization would:

- prevent them from being sufficiently objective about the organization during the grantmaking discussions and selection process, or
- prevent any other committee member or staff/contractor from being free to discuss the organization in their presence.

Conflict of Interest Procedures

For staff

1. All team members must complete an annual disclosure form identifying all interests and conflicts of interest. All staff members must recuse themselves from any grant preparation, discussion or partnership with any organization with which they have an interest or conflict of interest.

For Steering Committee and advisory committee/panel members

1. Prior to the grant discussion meeting, every committee/panel member shall review proposed grants and associated materials in the docket, including those with which they have an interest or conflict of interest.
2. At the beginning of the grant discussion meeting, before discussion begins, Turning Tides staff reviews the Conflict of Interest policy and committee/panel members must disclose any interests or conflicts of interest, together with all material facts to the Director(s) and members of the committee/panel. If any Steering Committee member feels another member’s interest in an organization should be treated as a conflict of interest, it shall be discussed and decided on as a group.
3. During the grant discussion meeting, when a member has a conflict of interest with one of the organizations on the docket, that member:



- must leave the virtual room during discussion of that organization with which they have a conflict of interest (making a statement about the organization before they leave, if they so choose); and
 - may not include the organization with which they have a conflict of interest in any list of 'recommended' organizations.
4. The Steering Committee's or advisory committee/panels' decision on a recommended grant will be made by a vote, potentially during the discussion or over email, depending on flow of the conversation. Any member who has an automatic or personally acknowledged conflict of interest shall abstain from the vote, or lobbying for the vote, on that individual application. That member is free to make recommendations and final votes on other organizations/applications.
 5. The minutes of Steering Committee or advisory committee/panel meeting(s) shall contain:
 - the names of the persons who disclosed or otherwise were found to have an interest in connection with a potential grantee partner, the nature of the interest, any action taken to determine whether a conflict of interest was present, and the committee's/panel's decision as to whether a conflict of interest was present;
 - the names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed arrangement, and a record of any votes taken in connection with the proceedings.

Conflict/Grievance Resolution

If a team, committee or panel member has a concern with a specific organizational decision or process, it can be addressed with Turning Tides Director(s) and/or the Steering Committee. If a member has a problem with another Steering Committee member, advisory committee/panel member, or staff person, they should address that person first. If the efforts are not successful, they should contact (one or both of) the Turning Tides' Director(s) who will attempt to mediate. If still not resolved, the issue is moved to the Steering Committee for resolution.

Violations of the Conflict of Interest Policy

If the Directors, Steering Committee or advisory committee/panel has reasonable cause to believe an interested person has failed to disclose actual or possible conflicts of interest, it shall inform the interested person of the basis for such belief and afford the interested person an opportunity to explain the alleged failure to disclose.

If, after hearing the interested person's response and after making further investigation as warranted by the circumstances, Directors, Steering Committee or advisory committee/panel determines the interested person has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.