



KENYA VETERINARY ASSOCIATION (KVA)

CONFLICT OF INTEREST POLICY

DOCUMENT CONTROL

Field	Details
Document title	KVA Conflict of Interest Policy
Document owner	KVA Secretariat
Approving authority	National Executive Council (NEC)
Version	1.0
Status	Final, Approved and Adopted
Effective date	September 17, 2026
Applies to	NEC members, BEC Members, office bearers, committee members, staff, interns, volunteers, consultants, trainers and other persons acting for or representing KVA.
Review cycle	Every three years from the effective date, or earlier following material legal, organizational or risk changes.

VERSION CONTROL

Version	Date	Summary of changes	Approved by
1.0	17/09/2026	Initial policy for approval	NEC

RELATED KVA POLICIES AND PROCEDURES

- Financial Crime Prevention Policy and Procedures
- Whistleblowing and Non-Retaliation arrangements
- Data Protection Policy and Procedures
- Records Management and Retention Policy
- Safeguarding Policy and Gender Equality, Disability and Social Inclusion (GEDI) Policy
- Human-resource Policy

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1. POLICY STATEMENT

KVA requires decisions to be made in the best interests of the Association and the communities, members and partners it serves. A conflict of interest is not necessarily wrongdoing; the risk arises when an interest is hidden, unmanaged or allowed to influence a KVA decision. All persons covered by this policy must identify, disclose and appropriately manage real, potential and perceived conflicts promptly.

2. SCOPE AND OBJECTIVES

Scope

This Policy applies to conflicts of interest arising in KVA governance, employment, procurement, recruitment, partnerships, grants, programmes, research, events and other KVA activities.

It applies to NEC members, BEC members, Committee members, Sub-committee members, Special Task Force Members, other office bearers, trustees, staff, interns, volunteers, students, consultants, trainers and any other person acting for or representing KVA. KVA should also communicate relevant requirements to partners, suppliers, and contractors where their role can influence KVA decisions.

Objectives

The objectives of this policy include:

- Promote early identification and disclosure of actual, potential and perceived conflicts of interest;
- Provide a consistent process for assessing and managing declared conflicts;
- Protect the integrity and impartiality of KVA governance, procurement, recruitment and other decisions; and
- Ensure declarations, recusals and management actions are appropriately recorded and reviewed.

3. LEGAL AND POLICY FRAMEWORK

KVA will apply this policy consistently with applicable Kenyan law and contractual obligations. The Conflict of Interest Act, 2025 primarily regulates public officers and specified reporting entities; where it applies to a KVA activity or individual, its requirements prevail. KVA adopts the broader integrity principles of disclosure, impartial decision-making, recusal and proper record-keeping as institutional good practice. The policy should also be read with KVA's Financial Crime Prevention, Whistleblowing and Non-Retaliation, Data Protection, Records Management, Safeguarding and GEDI policies.

The Conflict of Interest Act, 2025 recognises real, apparent and potential conflicts and requires affected public officers to avoid or disclose conflicts and recuse themselves from relevant decisions. KVA uses the same practical concepts internally.

4. WHAT IS A CONFLICT OF INTEREST?

A conflict exists where a person's private, professional, financial, family or other interest could influence, or reasonably appear to influence, their judgement or actions for KVA.

- Real conflict – an existing interest is affecting or could affect a current KVA duty or decision.
- Potential conflict – an interest may conflict with a KVA duty or decision in the future.
- Perceived conflict – a reasonable person could believe that an interest may improperly influence the decision, even if it does not.

Private interests may be direct or indirect and may involve the individual, a family member, close associate, business, employer, client, organization or other relationship from which a benefit or advantage could arise.

5. SITUATIONS REQUIRING DISCLOSURE

Disclosure is required whenever an interest could reasonably affect, or appear to affect, impartiality. Common examples include:

- Procurement, tender evaluation or contract management involving a business in which the person or a close associate has an interest;
- Recruitment, promotion, consultancy selection or supervision involving a relative, close associate or person with whom there is a significant personal relationship;
- Participating in grant, sponsorship, partnership or funding decisions involving an organization with which the person has a financial, governance, employment or advisory relationship;
- Outside employment, consultancy, directorship, business activity or professional engagement that competes with, overlaps with or may influence KVA responsibilities;
- Using KVA information, opportunities, assets, relationships or position for private benefit;
- Gifts, hospitality, travel or other benefits that could influence, or appear to influence, a KVA decision;
- Research, programme or technical decisions where professional, financial or institutional interests may compromise objective judgement.

6. CORE RESPONSIBILITIES

Everyone covered by this policy must:

- Avoid conflicts where reasonably possible;
- Disclose conflicts early and in sufficient detail for KVA to assess them;
- Not participate in a decision until the conflict has been assessed and a management decision made;
- Comply with the agreed management action; and
- Update a declaration when circumstances substantially change.

Failure to recognise a conflict is not automatically misconduct. Knowingly concealing a conflict, providing misleading information, ignoring a management direction or using a KVA role for improper private benefit may constitute a breach of this Policy. Such matters shall be referred to the NEC for determination and any appropriate corrective, disciplinary, contractual, governance or legal action.

7. DECLARATION REQUIREMENTS

7.1 Event-based declaration

Any person must make a declaration as soon as a conflict arises or becomes known. A declaration should not wait for the annual process.

7.2 Meetings and decisions

At the start of each formal KVA meeting participants should be invited to declare relevant conflicts. A person must also declare a conflict before discussion of the affected agenda item, case, procurement, recruitment, transaction or other decision, and as soon as a new conflict becomes known. The declaration and the management decision must be recorded in the minutes, evaluation record or other decision record.

8. MANAGING A CONFLICT

After disclosure, the meeting participants shall assess the conflict, excluding the declaring person from that determination where appropriate. The response shall be proportionate to the risk.

- Record the disclosure with no further action where the conflict is remote or insignificant;
- Permit limited participation while excluding the person from the final decision;
- Require the person to leave the discussion, evaluation or vote (recusal);
- Assign the matter, supervision or decision to another person;
- Restrict access to relevant confidential information;
- Remove the person from a procurement, recruitment, grant, investigation or other process;
- Require divestment, termination or modification of the conflicting outside role or activity where appropriate; or
- Where the conflict cannot be adequately managed, decline or end the appointment, transaction, assignment or relationship in accordance with applicable law or contract.

NEC decisions should protect both KVA and the individual, while maintaining fairness, due process and operational practicality. Recusal must be genuine: a recused person must not attempt to influence the matter informally.

9. SPECIFIC CONTROLS

9.1 Procurement and contracting

No person may evaluate, recommend, approve or influence a procurement or contract in which they have a relevant private interest. Procurement participants must disclose conflicts before accessing bids or evaluation materials. Undisclosed related-party transactions are prohibited.

9.2 Recruitment and people decisions

Persons must not participate in recruitment, promotion, remuneration, disciplinary or other personnel decisions involving a relative, close associate or other relationship that could impair impartiality. The conflict must be declared and an independent decision-maker assigned.

9.3 Gifts and hospitality

Gifts and hospitality must comply with KVA's Financial Crime Prevention Policy. A gift or benefit that creates a conflict, expectation of favourable treatment or reasonable appearance of influence must be declined or otherwise managed and recorded.

9.4 Outside roles and use of information

Outside employment, consultancies, directorships and business interests must not interfere with KVA duties, misuse KVA resources or confidential information, or create unmanaged competition or divided loyalty. Confidential or non-public KVA information must never be used for private advantage.

10. GOVERNANCE AND DECISION-MAKING

- The NEC provides oversight of this policy.
- The NEC manages declarations concerning the CEO or an NEC member.
- Where the President has the conflict, the Vice-President shall manage the matter. If the Vice President is also conflicted any other unconflicted NEC member shall manage the matter.
- The Chief Executive Officer (CEO), or a designated person appointed in the absence of the CEO, administers declarations for staff and operational activities.
- No person may determine the management of their own conflict.
- Where independence cannot be achieved internally, KVA may seek external legal, governance or professional advice.

11. CONFLICT OF INTEREST REGISTER

KVA shall maintain a confidential Conflict of Interest Register recording relevant declarations, management decisions, recusals and review dates. Access is limited to persons who need the information for governance, compliance, audit or legal purposes. Records shall be retained and disposed of under the KVA Records Management and Retention Policy and the Data Protection Policy.

12. REPORTING UNDISCLOSED CONFLICTS AND NON-RETALIATION

Concerns that a conflict has been concealed, improperly managed or used for private benefit should be raised through KVA's approved Whistleblowing and Non-Retaliation arrangements or other authorised reporting channel. KVA prohibits retaliation against a person who raises a concern in good faith or participates in a review or investigation.

Where the concern involves suspected bribery, fraud, corruption or other financial crime, the Financial Crime Prevention Policy governs the substantive response. Safeguarding or GEDI concerns are referred to the respective specialist policy.

13. BREACHES AND REVIEW

Possible breaches will be assessed fairly and proportionately. KVA may take corrective, disciplinary, contractual or governance action and may refer matters to competent authorities

where required by law. This policy will be reviewed at least every three years, or earlier following material legal, organizational or risk changes.

14. APPROVAL AND AUTHORISATION

This Conflict of Interest Policy becomes effective upon approval by the National Executive Council of the Kenya Veterinary Association.

Approval item	Details
Approval date	Wednesday, 16 th September 2026
Effective date	Thursday, 17 th September 2026
Next scheduled review	Monday, 17 th September 2029
Policy version	1.0

President

Name: **__DR. KELVIN OSORE__**

Signature:  _____

Date: **__THURSDAY, 17TH SEPTEMBER 2026. ____**

— END —

ANNEXES**ANNEX 1: CONFLICT OF INTEREST DECLARATION FORM**

Use this form for an actual, potential or perceived conflict, or where a declaration is made for transparency. It may be used for governance, committee, procurement, recruitment, programme, grant, partnership, research, case-management or other KVA decisions.

A. Declarant details	Information
Name	
KVA role / capacity	NEC / Committee / Staff / Consultant / Panel member / Other: _____
Date	
Meeting / activity / reference	

B. Type and nature of conflict

Type: ☐ Actual/real ☐ Potential ☐ Perceived ☐ Transparency disclosure only

Nature: ☐ Personal relationship ☐ Family relationship ☐ Professional/business relationship

☐ Previous involvement in the matter

☐ Prior advice/representation/supervision/employment ☐

Financial/contractual/consultancy/employment interest

☐ Prior public comments/opinions ☐ Possible personal/professional/financial/reputational benefit or harm ☐ Other: _____

Brief details:

—

C. Information already accessed

Have you already accessed information relevant to this matter? ☐ Yes ☐ No

If yes: ☐ Documents/files ☐ Emails/correspondence ☐ Meeting discussions ☐

Legal/professional advice ☐ Statements/evidence ☐ Other: _____

D. Declarant confirmation

I declare that the information above is true and complete to the best of my knowledge. I will disclose any material change, will not improperly influence the matter, will not access or use restricted information while recused, and will comply with the management decision.

Name: _____ Signature/confirmation: _____ Date: _____

E. Decision by responsible independent authority

☐ No conflict requiring action; full participation allowed

☐ Participation allowed with stated limitations

☐ No further access to specified information

☐ No participation in discussion/evaluation

- ☐ Leave the meeting for the relevant item
- ☐ Full recusal from the matter
- ☐ Matter referred to NEC / other independent authority
- ☐ Other: _____

Conditions / reasons:

Follow-up: ☐ Restrict access ☐ Remove from communication/evaluation channel ☐ Record
recusal in minutes/decision record ☐ Reassign matter ☐ Secure/retrieve information already
shared ☐ Update register ☐ Other: _____

Decision-maker: _____ Designation: _____ Date:

ANNEX 2: CONFLICT OF INTEREST REGISTER

The Secretariat or responsible chair shall maintain this register. It should be updated whenever a conflict is declared and reviewed where circumstances change.

Date	Person / role	Meeting / activity ref.	Matter / agenda item	Type	Brief interest	Decision / action	Review / status

ANNEX 3: MEETING / DECISION CONFLICT DECLARATION RECORD

Use this short record for meetings, procurement panels, recruitment panels and other decision processes. Use Annex 1 where a conflict requires fuller assessment or management.

Field	Record
Meeting / process	
Date and reference	
Agenda item / decision	
Person declaring	
Declaration	☐ Actual/real ☐ Potential ☐ Perceived ☐ Transparency only
Decision	☐ Full participation ☐ Limited participation ☐ Information restricted ☐ Leave item ☐ Full recusal ☐ Refer onward
Action recorded in minutes / evaluation record	☐ Yes ☐ No
Chair / responsible authority	

Suggested chairperson prompt

“Before we proceed, members are asked to declare any actual, potential or perceived conflict of interest relating to today’s agenda or decisions. A further declaration must be made if a conflict becomes apparent during the meeting. Declarations and management actions will be recorded.”

ANNEX 4: QUICK GUIDE FOR MANAGING A CONFLICT

Step	Action
1. DISCLOSE	Declare the interest at the start of the relevant process, before the affected matter is discussed, or immediately when it becomes known.
2. ASSESS	An independent chair or responsible authority considers the relationship, significance, information access, decision-making role and reasonable perception of bias.
3. DECIDE	Choose a proportionate management response.
4. RECUSE / RESTRICT WHERE NECESSARY	Options include limited participation, restricted information access, exclusion from discussion/evaluation, leaving the meeting, full recusal, reassignment or referral to NEC.
5. RECORD	Document the declaration and action in the register and, where relevant, meeting minutes, procurement/recruitment records or case files.
6. REVIEW	Update the arrangement if circumstances change. A recused person must not influence the matter informally.