I. Purpose

The purpose of this Conflict of Interest Guidance (this “Guidance”) is to ensure the actual and perceived integrity and consistency of the Internet Society Foundation’s (the “Foundation’s”) open, impartial, and transparent application review process. This Guidance defines conflict of interest, outlines responsibilities, and provides assistance in identifying actual, potential, or perceived conflicts of interest for individuals who volunteer as members of either the Foundation’s Selection Committee (SC) or one of the Independent Program Review Committees (IPRC).

The Selection Committee or Independent Program Review Committee Member (“SC/IPRC Member”) is part of an independent, impartial team of experts appointed by the Foundation. They have the responsibility of providing rigorous, independent technical assessments of funding applications pre-screened by the Foundation for one or more of the following funding areas: Beyond the Net Large; Resiliency and Responding to Emergencies (RARE); Strengthening Communities / Improving Lives and Livelihoods (SCILLS); Research; and Building Opportunities & Leveraging Technology (BOLT) (each, a “Funding Area”).

II. Definition

A conflict of interest may exist when the objectives, interests, or concerns of a SC/IPRC Member may, in fact (an “actual” conflict) or in appearance (a “perceived” conflict), be identified as competing with the interests or concerns of the Foundation or the Funding Area for which the SC/IPRC Member is reviewing-and-scoring applications.

Likewise, a conflict of interest may also exist where a “Close Associate” or “Related Organization” of the SC/IPRC Member may be seen to have interests competing with the interests or concerns of the Foundation or a Funding Area. This means that a relationship exists wherein the SC/IPRC Member - while working with the “Close Associate” or “Related Organization” - is likely to consider, or is likely to be perceived to consider, the interests of that individual or organization as their own, rather than the Foundation’s.

A “Close Associate” is an SC/IPRC Member’s current or former colleagues or team members, personal friends, or relatives (including any spouse or domestic partner, ancestors, siblings, children, grandchildren, great grandchildren, and their spouses or domestic partners.

A “Related Organization” is any corporation or business of which the SC/IPRC Member or a “Close Associate” has an actual or perceived financial interest.

III. Requirements

It is the responsibility of the SC/IPRC Member to immediately bring to the attention of the Foundation’s Executive Director and appropriate Program Officer any of the SC/IPRC Member’s or
Interested Party’s associations or relationships that may give rise to an actual, potential, or perceived conflict.

IV. Potential Contexts and Situations

A variety of situations raise potential conflicts of interest for an SC/IPRC Member. The following list provides some examples of such situations involving an SC/IPRC Member and their Close Associate or Related Organization (in either case, an “Interested Party”):

1. The Interested Party (or the SC/IPRC Member) directly or indirectly benefits or profits as a result of an action, policy, or transaction made by the Foundation (a “financial interest”). A financial interest is not necessarily a conflict of interest;
2. The Interested Party (or the SC/IPRC Member) obtains a non-financial benefit or advantage that they would not have obtained absent the relevant SC/IPRC Member’s relationship with Foundation;
3. The Interested Party’s (or SC/IPRC Member’s) main professional responsibilities are directly linked to the development of funding applications to the Foundation;
4. The Interested Party (or SC/IPRC Member) is employed (or, within the past two years was employed) by an organization that also funds the applicant or grantee independent of the Foundation’s program;
5. The Interested Party (or SC/IPRC Member) is employed (or, within the past two years was employed) by an organization that is a potential beneficiary of Foundation funding;
6. The Interested Party (or SC/IPRC Member) has been involved in the development process of an application to the Funding Area the SC/IPRC Member has been asked to review-and-score;
7. The Interested Party (or the SC/IPRC Member) is employed (or, within the past two years was employed) by a government, corporation, or organization that has assisted in the development process of an application to the Funding Area the relevant SC/IPRC Member has been asked to review-and-score; and
8. The Interested Party (or the SC/IPRC Member) is otherwise a potential beneficiary of Foundation funding.

V. Conflict Discussion

If an SC/IPRC Member does not comply with the requirements contained in this Conflict of Interest Guidance, non-compliance will be reviewed and addressed by the Foundation’s Executive Director and appropriate Program Officer. Remedial actions will be determined on a case-by-case basis, but such actions may include an SC/IPRC Member being asked to cease serving on the Foundation’s Selection Committee or Independent Program Review Committee.