Conflict of Interest Screening Policy

Department: Evidence Intake & Verification Desk
Policy ID: EIV-06
Version: 1.0
Effective Date: Upon Publication

1. Policy Title

Conflict of Interest Screening Policy

2. Authority & Legal Standing

2.1 **Binding Instrument.**
This Conflict of Interest Screening Policy ("Policy") constitutes a binding operational and contractual instrument governing the identification, declaration, assessment, recording, and management of conflicts of interest arising at the evidence intake and verification stage.

2.2 **Condition of Processing.**
No Submission may proceed beyond intake screening into verification, investigation, analysis, archival handling, or any other internal workflow unless conflict of interest screening has been completed and a defensible screening outcome recorded under this Policy.

2.3 **Applicability as a Gate.**
Conflict of interest screening is a mandatory procedural gate. Absence of screening, incomplete screening, or unresolved material conflict blocks further processing.

2.4 **Reliance and Defensibility.**
This Policy is expressly drafted to be relied upon in judicial, regulatory, arbitral, oversight, and audit contexts as evidence that the Organisation systematically screens for motive contamination, relational bias, financial incentives, retaliatory intent, and institutional conflicts prior to engaging with submitted material.

3. Purpose

3.1 **Primary Objective.**
The purpose of this Policy is to prevent the Organisation from being used—intentionally or inadvertently—as a vehicle for personal vendettas, commercial leverage, political manipulation, reputational attacks, retaliatory disclosures, or conflicted advocacy disguised as evidence submission.

3.2 **Integrity Objective.**
This Policy exists to ensure that the Organisation's intake decisions are insulated from conflicted sources, undeclared incentives, undisclosed relationships, and internal role conflicts that could compromise neutrality, proportionality, or lawful handling.

3.3 **Non-Determination.**
Conflict of interest screening does not determine truth, falsity, wrongdoing, or merit. It determines only whether conflicts exist that require rejection, restriction, containment, disclosure, or structural separation before any further handling occurs.

4. Scope & Applicability

4.1 **Scope.**
This Policy applies exclusively to conflict of interest screening conducted at the intake and verification stage, prior to investigation, analysis, archival processing, or publication consideration.

4.2 **Applicability.**
This Policy applies to:

- All Submissions received via Authorised Channels
- All submitters, commissioning entities, intermediaries, and representatives
- All internal personnel, volunteers, contractors, and systems involved in intake handling
- All commissioned, pro bono, and public-interest engagements at intake

4.3 **Scope Limitation Clause.**
This Policy does not govern investigative conduct, analytical assessment, publication decisions, disciplinary action, or employment matters. It governs intake-stage conflict screening only.

5. Definitions (Local Only)

For the purposes of this Policy only:

5.1 **Conflict of Interest.**
Any circumstance in which personal, financial, professional, relational, political, ideological, or institutional interests could reasonably be expected to influence—or appear to influence—the submission, handling, assessment, or disposition of a Submission.

5.2 **Material Conflict.**
A conflict that creates a non-trivial risk of bias, misuse, retaliation, leverage, or improper influence.

5.3 **Declared Interest.**
Any relationship, incentive, or involvement disclosed by a submitter or internal participant.

5.4 **Undeclared Interest.**
Any interest reasonably inferred from available information but not disclosed.

5.5 **Screening Outcome.**
The recorded decision produced under this Policy determining disposition or constraints.

Definitions are local to this Policy and have no binding force outside it.

6. Permitted Activities

Within the strict scope of this Policy, the Organisation may:

6.1 Require submitters and commissioning parties to disclose relevant interests, relationships, incentives, or disputes related to a Submission.

6.2 Perform intake-stage screening to identify potential conflicts based on declared information, contextual indicators, and intake metadata.

6.3 Apply procedural outcomes including acceptance with constraints, restriction, escalation, rejection, or referral.

6.4 Record conflict screening outcomes and supporting metadata for auditability.

6.5 Impose separation-of-duties controls where internal conflicts are identified.

No other activities are permitted under this Policy.

7. Prohibited Activities

The following are expressly prohibited:

7.1 Processing a Submission without completing conflict screening.

7.2 Ignoring, suppressing, or minimising declared or apparent conflicts to facilitate progression.

7.3 Accepting Submissions where material conflicts indicate retaliatory intent, coercive leverage, or bad-faith targeting.

7.4 Allowing conflicted personnel or volunteers to participate in handling decisions.

7.5 Treating payment, commissioning status, or public interest claims as justification to bypass conflict controls.

7.6 Representing conflict screening outcomes as determinations of credibility or truth.

8. Procedural Requirements

8.1 **Mandatory Screening Sequence.**
Every Submission must undergo the following steps:

a) Conflict Disclosure Prompt — submitter is required to declare relevant interests and relationships
b) Internal Conflict Check — intake personnel confirm no internal role conflicts exist
c) Conflict Indicator Review — intake desk assesses declared and apparent conflict signals
d) Risk Classification — conflicts classified as none, manageable, or material
e) Screening Outcome Assignment — outcome recorded as defined in Section 9
f) Audit Record Creation — decision and rationale logged

8.2 **No Deviation.**
Deviation from this sequence constitutes a breach.

9. Safeguards & Risk Controls

9.1 **Conflict Categories (Mandatory).**

Conflicts are categorised as:

C0 — No Apparent Conflict
C1 — Manageable Conflict (disclosable, containable, non-determinative)
C2 — Material Conflict (bias, leverage, retaliation, financial or relational risk)
C3 — Prohibited Conflict (coercive, extortionate, retaliatory, or undisclosed high-risk interest)

9.2 **Default Outcomes by Category.**

- **C0:** Proceed subject to other intake gates
- **C1:** Proceed with documented constraints and separation controls
- **C2:** Restrict, escalate, or reject depending on risk posture
- **C3:** Reject outright; no onward processing

9.3 **Internal Separation Controls.**
Where internal conflicts exist, conflicted individuals are excluded from all handling decisions.

9.4 **Non-Endorsement Safeguard.**
Acceptance despite manageable conflict does not imply endorsement or validation.

10. Enforcement & Compliance Mechanisms

10.1 **Hard Gating.**
Systems must prevent progression absent a recorded screening outcome.

10.2 **Audit Logging.**
Conflict screening records must include:

- Declared interests
- Conflict category
- Outcome
- Timestamp
- Responsible role or system

10.3 **Periodic Review.**
The Organisation may conduct internal reviews to detect screening drift or pattern abuse.

11. Breach Handling & Remediation

11.1 **Breach Definition.**
A breach includes:

- Processing without screening
- Misclassification of conflicts
- Allowing conflicted participation
- Suppression of material conflict indicators

11.2 **Containment.**
Affected Submissions are immediately contained or suspended.

11.3 **Remediation.**
Remediation may include re-screening, rejection, deletion, access restriction, or procedural correction.

12. Limitation of Liability

12.1 The Organisation assesses procedural conflict risk, not intent or morality.

12.2 The Organisation is not liable for submitter misrepresentation or nondisclosure, provided screening was conducted in good faith.

12.3 No liability arises from rejection or restriction based on conflict risk.

12.4 Nothing limits liability where prohibited by law.

13. Non-Delegation & Non-Expansion Clause

13.1 This Policy confers no investigative, analytical, or publication authority.

13.2 This Policy may not be interpreted to expand organisational scope or override other controls.

13.3 Conflict screening is not a legal determination.

14. Jurisdiction & Governing Law

This Policy is governed by the laws of England and Wales.
Jurisdiction lies with the courts of England and Wales, subject to mandatory statutory obligations.

15. Amendments & Version Control

This Policy may be amended only by the Organisation.
Amendments take effect upon publication.
Version identifiers are retained with screening records.

16. Supremacy Within Scope

Within the domain of intake-stage conflict of interest screening, this Policy is authoritative. Outside that domain, it has no force.