
**Bureau du Directeur
Director's Office**

Circular No. **DIR 06/2008** Date: **29/10/2008**
Circulaire n°



**International Training Centre
Centre international de formation
Centro Internacional de Formación**

Register of Financial Interests

- 1 In accordance with the provisions of the Constitution of the International Labour Organization, the Standards of Conduct for the International Civil Service and the Staff Regulations, service with the International Training Centre of the International Labour Organization is subject to the highest standards of conduct and integrity. As part of the review of governance arrangements at the Centre, a requirement to complete a Register of Financial Interests is being introduced for senior officials and other officials designated in paragraph 3 below. The provisions of this circular will become effective on the day it is issued. This disclosure of financial interests is in addition to the general disclosure of interests required of all officials under Circular No. 04/2008 (Ethics at the Centre).
- 2 The resources made available to the Centre are public funds contributed mainly by the taxpayers of ILO member States, especially Italy, either directly or through the Office in Geneva, and by the various bodies or individuals who support, or benefit from, the Centre's activities. Their financial management must therefore meet the strictest ethical standards. It is essential that all activities be carried out in a manner above reproach, with complete impartiality and with no preferential treatment. Action taken must always be in line with the best interests of the Centre. Any conflict of interest, perception of a conflict of interest or situation involving the potential for a conflict of interest must be avoided.
- 3 As part of the Centre's governance and accountability system, a disclosure in the form of the attached Register of Financial Interests must be made by designated officials every year. Designated officials are officials occupying positions at the D.1 level and above, the Chief of Financial Services and the Treasurer, all officials in charge of purchasing and contracts within the Internal Administration Service, and any other official whose position is specified by the Director of the Centre. The disclosure to be made by the official relates both to the official and to his/her close relatives. Close relatives are persons with close family ties to officials.
- 4 The Register of Financial Interests includes a report of any income, gifts or other allowances that have been received either by the official or a close relative, due directly or indirectly to the official's employment at the Centre. The disclosure form

also requires the official to declare any involvement or interest in any entity having a commercial relationship with the Centre which could thereby have an impact on, or be perceived to have an impact on, the official's objectivity or independence in the performance of his/her duties at the Centre.

- 5 The disclosure form for the Register of Financial Interests must be completed and submitted to the Office of the Treasurer and Chief of Financial Services by 28 February each year. Designated officials will be required to submit their first Register of Financial Interests by 28 February 2009, covering the period 1 January to 31 December 2008. A reminder will be circulated at the beginning of 2009. The documents shall remain confidential and may be used only by the Office of the Treasurer and Chief of Financial Services, the Ethics Officer or another person specifically authorized by the Director of the Centre.
- 6 A template for officials to use in completing the disclosure form for the Register of Financial Interests will be made available on the Centre's Intranet.
- 7 Officials are reminded that, when confronted with a situation that could lead to a conflict of interest or a perception thereof, they must disclose that interest to their immediate supervisor as soon as possible and refrain from any further involvement in that situation. High standards of conduct and ethical behaviour are fundamental obligations of a Centre official, and non-compliance by any official with the principles and provisions of this circular may lead to disciplinary action.
- 8 Officials wishing to obtain further guidance or advice on the provisions of this circular are encouraged to contact, in confidence, the Treasurer and Chief of Financial Services or the Ethics Officer.

François Eyraud
Executive Director
Director of the ITC-ILO

Instructions for completing the disclosure form for the Register of Financial Interests

Introduction

1. The disclosure form for the Register of Financial Interests attached to these instructions is issued pursuant to Circular No. 06/2008, dated 29/10/2008.
2. In accordance with that circular, designated officials are required to complete a disclosure form for the Register of Financial Interests at yearly intervals, reporting, among other things, any gifts other than those with a purely symbolic value, or supplements to Centre remuneration, and any situations that might constitute a conflict of interest.

When and where to file

3. The Register of Financial Interests shall be submitted by 28 February each year in relation to the period 1 January to 31 December of the previous year. The first filing shall be for the period 1 January to 31 December 2008 and is due by 28 February 2009.
4. The forms shall be submitted to the Office of the Treasurer and Chief of Financial Services in a sealed envelope marked "private and confidential".

Completing the form

5. The Register of Financial Interests, which is appended to this document, has four sections:

Section I:	Personal information
Section II:	List of supplements, gifts, per diem, reimbursements and travel expenses received
Section III:	Potential conflicts of interest
Section IV:	Declaration

Section I. Personal information

6. Provide the personal information asked for in this section.

Section II. List of supplements, gifts, per diem, reimbursements and travel expenses received

7. Report any form of supplement received to Centre emoluments which is directly or indirectly related to your employment with the Centre. This includes provision of housing or subsidized housing, temporary or otherwise, any gift, per diem, reimbursement, entertainment or travel expense, favour, benefit, remuneration or in-kind contribution from any private entity, non-governmental organization or other non-Centre source totalling 250 euros or more during the reporting year. Any amounts received relating to outside activities must be included. Excluded from this requirement are dependency benefits payable to officials under national laws and residential accommodation which has been accepted by the Centre for its staff. Also excluded are per diem, reimbursements and travel expenses received from governments, constituents, UN organizations or other intergovernmental organizations. Gifts from relatives do not have to be reported, unless the person is in a position which would create a potential conflict of interest for the official.

Section III. Potential conflicts of interest

8. Report your interest in any commercial activity, entity or organization that could have an impact on your objectivity or independence in the performance of your responsibilities for financial administration in the service of the Centre. In particular:

- Active participation in commercial, industrial or financial affairs is normally incompatible with the status of an international official and is therefore not permissible.
- No official may be associated with the management or executive bodies of, or hold a financial interest in, any business concern if it is possible for them to benefit from such association or interest by reason of their official position with the Centre.
- An official who deals in their official capacity with any matter involving a business concern in which they or a close relative hold a financial interest must immediately disclose the nature of that interest to the Director of the Centre.
- The mere holding of shares in a company does not constitute a financial interest within the meaning of these rules unless it constitutes a substantial or controlling interest, in which case it must be reported to the Director of the Centre.

Section IV. Declaration

9. In this section, the official is required to affirm that the disclosures made in Sections I–III, as appropriate, are true, complete and correct to the best of his or her knowledge.

10. An official who cannot make such an affirmation must provide a satisfactory explanation in writing to the Director of the Centre.

DISCLOSURE FORM FOR THE REGISTER OF FINANCIAL INTERESTS

Section I. Personal information

Reporting period: _____ to _____

Name of official:

Staff number:

Date of birth:

Job title:

Grade:

Marital status:

Names of the official's close relatives:

Section II. List of supplements, gifts, per diem, reimbursements and travel expenses received

Have you or a close relative received any form of supplement, direct or indirect, to Centre emoluments related to your employment with the Centre or from outside activities?

Such supplements include provision of housing or subsidized housing, temporary or otherwise, any gift, per diem, reimbursement, entertainment or travel expenses, favour, benefit, remuneration or in-kind contribution from any private entity, non-governmental organization or other non-Centre source totalling 250 euros or more from a single source during the reporting year. All sums received for outside activities must also be reported. Dependency benefits under national laws, and residential accommodation which has been accepted by the Centre for its staff, do not have to be reported. Excluded from this requirement are per diem, reimbursements and travel expenses received from governments, constituents, UN organizations or other inter-governmental organizations. Gifts from relatives do not have to be reported, unless the person is in a position which would create a potential conflict of interest for the official.

Yes No If yes, disclose in the box below.

Source (name and address)	Detailed description	Received by	Value in euros (check appropriate box)			
			250 – 1 000	1 001 – 5 000	5 001 – 10 000	Over 10 000
1.						
2.						
3.						
4.						
5.						

Section III. Potential conflicts of interest

Do you have any interest in, or association with, any entity with which you may be required, directly or indirectly, to have commercial dealings on behalf of the Centre, or which has any commercial interest in the work of the Centre, or is engaged in an area of activity in common with the Centre?

Yes No If yes, please specify below.

Entity	Nature of interest or association	Nature of dealings	Approved by	Date

Have you or officials reporting to you had, to the best of your knowledge, commercial dealings on behalf of the Centre with any of your close relatives or entities in which a close relative has a significant interest or senior role?

Yes No If yes, please specify below.

Entity	Nature of interest or association	Nature of dealings	Approved by	Date

Section IV. Declaration

A. The disclosures I have made in this form, including this affirmation, and all attachments thereto, are true, complete and correct to the best of my knowledge and belief. I understand that failure to provide true, complete and correct information in this form to the best of my knowledge and belief may have serious consequences, including disciplinary proceedings.

B. I understand that I must seek guidance concerning anything that could affect my objectivity or independence regarding the performance of my duties for the Centre, or that could affect the perception by others of my objectivity and independence.

Signature of the official: _____ Date: _____