THE UGANDA COUNTRY COORDINATING MECHANISM FOR THE GLOBAL FUND

To Fight AIDS, Tuberculosis & Malaria

Ref-Doc- 3d (Revised)

CONFLICT OF INTEREST MANAGEMENT NOTE DURING CCM BOARD RENEWAL 2026

1. BACKGROUND

The Uganda Country Coordinating Mechanism (UCCM) is a multi-stakeholder partnership body whose civil society, private sector and development partner members are drawn from a broad and often overlapping network of organizations which on the other hand creates governance risks that must be actively managed, particularly during the Board Renewal cycle when elections determine who represents each constituency at Board level.

In accordance with **Section 2.5(g)** of the CCM Governance Manual (4th Edition, 2024) and the Global Fund Code of Ethical Conduct and Conflict of Interest Policy along with the CCM COI Policy, the Note presents focused guidance to all constituency secretariats, constituency electoral committees and individual members through the conflict of interest (COI) obligations applicable to the 2026 Board Renewal. It is a companion document to the Board Renewal Roadmap and the revised Elections Guidelines.

2. NATURE OF THE OVERLAP CHALLENGE

Several organizations and individuals within the UCCM hold membership across more than one constituency simultaneously but most prevalent in the Civil Society sector, where organizations working across multiple disease areas (HIV/AIDS, TB and Malaria) may be registered members of several disease-specific constituency networks.

Similarly, individuals within these organizations may qualify to represent more than one constituency based on their professional profile. Without proper management, this creates a real and perceived risk of: conflict of interest in the nomination and election process, multiple voting or double representation within a single Board cycle and undue influence over electoral outcomes in constituencies where a candidate holds multiple memberships.

The 2026 Board Renewal has introduced additional complexity through two structural changes approved by the Board:

(a) The merger of the International NGO (INGO) and National NGO (NNGO) constituencies into a single merged constituency, and

(b) The establishment of a Youth Constituency as a new seat on the CCM Board.

Both changes introduce specific COI considerations that are addressed herein.

3. UGANDA CCM CONSTITUENCY OVERLAP AND COI RISK REGISTER

The table below identifies each Uganda CCM constituency, key areas of overlap and the associated conflict of interest risk level:

#	CONSTITUENCY	SECTOR	OVERLAP / COI RISK DESCRIPTION	RISK LEVEL
1	**Ministry of Health (MoH)**	Government	None — government seat based on office bearer; no election required.	Low

#	CONSTITUENCY	SECTOR	OVERLAP / COI RISK DESCRIPTION	RISK LEVEL
2	**Ministry of Local Government (MoLG)**	Government	None — government seat based on office bearer; no election required.	Low
3	**Min of Finance Planning and Economic Development.**	Government	None — government seat based on office bearer; no election required.	Low
4	**Uganda Aids Commission**	Government	None — government seat based on office bearer; no election required.	Low
5	**PLHIV Constituency**	Civil Society	Members may simultaneously belong to the TB or Malaria CSO constituencies. Member organizations may also serve as Sub-Recipients under active grants. PLWD networks commonly hold dual membership in disease-specific CSO constituencies. Youth sub-groups are active across this constituency and others	Medium
6	**TB CSO Constituency**	Civil Society	Overlaps with the HIV CSO and Malaria CSO constituencies for organizations working across multiple disease areas.	Medium
7	**Malaria CSO Constituency**	Civil Society	Overlaps with the HIV and TB CSO constituencies for multi-disease organizations.	Medium
8	**Faith-Based Organizations (FBO) Constituency**	Civil Society	FBOs active across HIV, TB and Malaria programs may hold membership across multiple disease-specific CSO constituencies.	Medium
9	**Private Sector Constituency**	Civil Society / Private	Private sector organizations may also be Sub-Recipients or hold commercial interests in grant activities, creating a structural COI risk.	Medium
10	**Academia and Research Institutions**	Civil Society	Limited overlap, though research institutions in receipt of Global Fund funding create a potential COI that must be declared.	Low
11	**Key Affected and Priority Populations (KAP_PP) Constituency.**	Civil Society	High overlap with the PLWD and HIV CSO constituencies. Individual persons may qualify under multiple categories and must formally commit to one constituency only.	High
12	**Merged NGO Constituency (INGO/NNGO)** Added per Board Minute UCCM/CB20/2025-Mar-Min 7	Civil Society	The merger of the INGO and NNGO constituencies creates elevated COI risk during the 2026 Board Renewal transition. Members previously registered under both legacy lists must submit a single-constituency declaration. Organizations that also hold membership in a disease-specific CSO constituency must elect one constituency only before the nomination period opens. Sub-Recipient status among member organizations requires a separate COI declaration at nomination. All members of both sub-groups participate in a unified general meeting under the same COI obligations.	Medium- High
13	**Youth Constituency (New Seat).** Added per Board Minute UCCM/CB20/2025-Mar-Min 7.	Civil Society	Youth leaders and organizations frequently hold membership in other CCM constituencies, notably KAP, PLWD and disease-specific CSO constituencies. Any individual or organization participating in the Youth Constituency election must first submit a single-constituency declaration. As a newly constituted constituency, the Youth Constituency Secretariat will require active CCM Secretariat support to administer COI procedures consistently with the standards	Medium

#	CONSTITUENCY	SECTOR	OVERLAP / COI RISK DESCRIPTION	RISK LEVEL
			applied across established constituencies.	
14	**WHO**	Development Partner	Ex-Officio, non-voting — no election required.	**None**
15	**UNAIDS**	Development Partner	Ex-Officio, non-voting — no election required.	**None**
16	**PEPFAR / USAID**	Development Partner	Ex-Officio, non-voting — no election required.	**None**
17	**Bilateral Development Partner Seat (currently FCDO)**	Development Partner	No election required. Representatives appointed internally.	**Low**
18	**USG Seat**	Development Partner	No election required. Representatives appointed internally.	**Low**
	Refugee Constituency	Co – Opted.	The relatively small pool of organizations active in refugee health programming increases the likelihood of overlapping affiliation.	**Medium**

4. GOVERNANCE MANUAL PROVISIONS ON OVERLAPPING MEMBERSHIPS

The CCM Governance Manual (4th Edition, 2024) directly addresses this challenge at **Section 2.2, Clauses (j) and (k):**

Clause 2.2(j): "Owing to the fact that constituencies may cut across, members of constituencies desirous of expressing interest in being elected as substantive or Alternate Members shall for all purposes and intent express their willingness to be nominated in one constituency where they believe they hold major impact and great expertise."

Clause 2.2(k): "For avoidance of doubt to clause (j) above, a member who has been nominated to stand in any of the constituencies shall not be eligible for nomination in another constituency where they equally double as members."

These provisions establish a clear single-constituency commitment rule: any individual or organization wishing to stand for election must formally declare and commit to one constituency only, forfeiting all electoral participation rights in every other constituency where they hold membership.

5. RECOMMENDED COI MANAGEMENT MEASURES

The CCM Secretariat recommends the following measures to operationalize conflict of interest management during the 2026 Board Renewal;

5.1 Single Constituency Declaration Form

Each organization and individual wishing to nominate or be nominated shall complete and sign a Single Constituency Declaration Form confirming the one constituency in which they are exercising their electoral rights. This form shall be submitted to the relevant constituency secretariat and copied to the CCM Secretariat before the close of nominations. Organizations and individuals that do not submit this form shall be ineligible to participate, regardless of meeting all other criteria.

5.2 Updated Membership Lists as a Gatekeeping Instrument

The verified membership lists submitted to the CCM Secretariat shall serve as the definitive record of who belongs to each constituency. No person or organization appearing on lists for multiple constituencies shall be permitted to vote in more than one constituency without first formally withdrawing from all others except one.

5.3 Cross-Constituency Disclosure Requirement

Constituency secretariats shall, upon receipt of any expression of interest, conduct a cross-check against the master membership list held by the CCM Secretariat to flag any candidate or nominating organization that appears in more than one constituency. Any identified case shall be referred immediately to the CCM Secretariat for direction.

5.4 CCM Secretariat Observer Role

In line with **Section 2.5(g)** of the Governance Manual, the CCM Secretariat shall designate a staff officer to observe elections in all constituencies specifically to monitor compliance with the COI Policy. The observer shall not interfere in the election process but shall document compliance and report to the Independent Elections Committee.

5.5 Ethics Committee Advisory Circular

The CCM Ethics Committee as part of the oversight role shall issue a COI Advisory Circular to all constituency secretariats before the nomination period opens, providing practical guidance on what constitutes a conflict of interest, how it must be disclosed, and the consequences of non-disclosure or misrepresentation.

6. GUIDANCE ON MEMBER SELECTION FOR THE MERGED INGO/NNGO CONSTITUENCY

The CCM Board has resolved to merge the International NGO (INGO) and National NGO (NNGO) constituencies into a single constituency effective from the 2026 Board Renewal cycle. This structural change reduces the total number of civil society seats but preserves the voices of both INGO and NNGO membership within the merged seat. The challenge for the merged constituency is to select its substantive member and alternate member in a manner that: (a) balances representation between the two legacy sub-groups and (b) minimizes internal friction and the perception of one sub-group being absorbed or marginalized by the other.

The CCM Secretariat recommends the following principles and mechanisms for the merged constituency:

6.1 One Constituency, Two Sub-Groups

For electoral purposes, the merged constituency shall be treated as a single constituency with two formally recognized sub-groups: the INGO sub-group and the NNGO sub-group. All INGO member organizations previously registered under the INGO Constituency and all NNGO member organizations previously registered under the NNGO Constituency shall be automatically recognized as members of the merged constituency upon submission of a consolidated membership list to the CCM Secretariat.

6.2 Balanced Representation Principle

The merged constituency shall at all times strive to ensure that the two Board seats available to it (one substantive member and one alternate member) reflect a balance between the INGO and NNGO sub-groups. The substantive member and alternate member shall, to the greatest extent possible, be drawn from different sub-groups.

6.3 Seat Allocation Mechanism

Recommended mechanism for allocating the substantive and alternate member seats within the merged constituency:

SEAT	BALANCE PRINCIPLE	RECOMMENDED SELECTION MECHANISM
Substantive Member	Drawn from the sub-group (INGO or NNGO) with the stronger representation in active Global Fund program implementation within the grant period.	Open nomination from both sub-groups. The merged constituency general meeting elects by simple majority. Where no consensus exists after two rounds, the Constituency Electoral Committee applies a tie-breaking rotation principle (alternating between INGO and NNGO from one Board term to

SEAT	BALANCE PRINCIPLE	RECOMMENDED SELECTION MECHANISM
		the next).
Alternate Member	Drawn from the sub-group not represented by the Substantive Member, to ensure both INGO and NNGO perspectives are present at Board level.	After the Substantive Member is declared, the remaining sub-group nominates and elects its representative as Alternate Member at the same general meeting. This preserves both voices at the Board without creating two competing seats.
Tie-breaking Rule	Where the elected Substantive and Alternate Members are from the same sub-group due to circumstances beyond control, the constituency shall notify the CCM Secretariat and reopen nominations for the underrepresented sub-group within 10 working days.	The CCM Secretariat shall document and report this exception to the Independent Elections Committee, which shall record it in the compliance report. No such exception shall be allowed in two consecutive Board terms for the same sub-group.

6.4 Single Constituency Declaration Within the Merged Constituency

Because the merged constituency is a single electoral unit, members of both sub-groups shall participate in the same general meeting and shall vote for both the substantive and alternate member positions. No separate elections shall be held for the INGO sub-group and the NNGO sub-group. The COI rule on single-constituency commitment applies equally within the merged constituency. Any individual or organization that holds membership in another CCM constituency must choose whether to vote in the merged INGO/NNGO constituency or in that other constituency, not both.

6.5 Transition Arrangements

The existing INGO and NNGO Constituency Secretariats shall jointly convene the first general meeting of the merged constituency, supported by the CCM Secretariat. At this meeting, the merged constituency shall elect or designate a single Constituency Secretariat to manage its affairs going forward. The CCM Secretariat shall provide a Merger Facilitation Support Officer to support the transition and ensure that no members are disenfranchised during the process. The Independent Elections Committee shall be notified of the merger transition plan and shall include oversight of the merged constituency election in its mandate for the 2026 Board Renewal cycle.

7. CONSEQUENCES OF COI VIOLATIONS

- Any nominee found to have submitted false or misleading information on a COI declaration form shall be immediately disqualified by the Constituency Electoral Committee. The CCM Secretariat shall be notified and the Independent Elections Committee informed.
- Any organization or individual found to have voted in more than one constituency during the same Board Renewal cycle shall have their vote(s) declared null and void. The affected constituency election results shall be referred to the Independent Elections Committee for review.
- Any elected member found to have concealed a conflict of interest at the time of election shall be subject to removal proceedings under the CCM Governance Manual and the CCM Code of Ethical Conduct.
- The CCM Secretariat shall report all COI violations to the Global Fund Secretariat as part of the post-renewal compliance documentation.