**Conflict of Interest Policy**

**Purpose**

Company Name (‘short name’) recognises that in order to carry out its mission statement, it needs to operate in a transparent and ethical manner. Company short name acknowledges that conflict of interests may exist, however it is the way conflicts are managed that ensure that the company remains beyond reproach.

Proper processes will ensure that conflicts of interest do not impact on the integrity of decision making. [Company short name also recognises that a perceived conflict of interest may be just as damaging as an actual conflict.

**Scope**

This policy applies to any Worker of Company short name who is responsible for decision making in relation to the Company short name’s finances and operations or is able to influence such a decision.

**Policy**

Company short name is committed to ensuring that actions and decisions taken at all levels in the organisation are informed, objective and fair. A conflict of interest may affect the way a person acts, decisions they make or the way they vote on group decisions.

Conflicts of interest must be identified, and action taken to ensure that personal or individual interests do not impact on the organisation's services, activities, or decisions.

All Company short name Workers and contractors are required to always act in the interests of the organisation, and to notify the organisation when this conflicts with other interests or commitments.

**Conflicts of interest**

This policy requires that all Workers and contractors:

* act impartially and without prejudice
* declare any potential or actual conflict of interest
* do not accept gifts or benefits that would influence a decision

This will include situations in which:

* close personal friends or family members are involved, such as decisions about employment, discipline or dismissal, service allocation or awarding of contracts
* an individual or their close friends or family members may make a financial gain or gain some other form of advantage
* an individual is involved with another organisation or offers services that are in a competitive relationship with our organisation and therefore may have access to commercially sensitive information, plans or financial information
* an individual is bound by prior agreements or allegiances to other individuals or agencies that require them to act in the interests of that person or agency or to take a particular position on an issue.

**Procedure**

**Registration of known conflicts of interest**

A register of conflicts of interest will be kept and all board or management committee members, staff and volunteers (if applicable) will be asked to declare:

* Potential or actual conflicts of interest that exist when a person joins the organisation
* Conflicts of interest that arise during their involvement with the organisation.

The register will be maintained by Company short name. All potential and actual conflicts will be recorded in the register, showing:

* the name of individual
* their position or role in the organisation
* the nature of the interest they hold
* the date of record
* any incidents that arise where the interest comes into conflict with the interests of the organisation, the date of the incident and a summary of how it was managed.

**Management of conflicts of interest**

Where a conflict of interest is declared or identified:

* The conflict will be assessed by the staff member’s immediate supervisor, or the most senior staff person, the Company short name.
* Where the conflict concerns a group process, the assessment may be conducted by the group convenor, or the staff team concerned.
* If a conflict of interest exists or there is a perception that a conflict exists, the staff member may be asked to:
* contribute to the discussion but abstain from voting or taking part in a decision on the matter
* observe but not take part in the discussion or decision making
* leave the meeting during discussion and decision on the matter

**Staff involvement in external activities**

Company short name encourages and supports staff members becoming involved in community activities and volunteer work in their personal lives. However, it is possible that staff members may undertake volunteer or professional roles outside the organisation that give rise to a conflict of interest, or a perception of conflict (e.g., Staff undertaking consultancy work for member organisations or government agencies).

As a result, Company short name expects that all staff members declare their involvement in external activities related to the work of Company short name when they are employed and discuss and plan with their supervisor how any potential conflicts of interest can be managed. Staff members taking on other (new) work outside Company short name need to inform their supervisor.

**Contractors**

All contracts with external consultants being engaged by the organisation will include a declaration that no conflict of interest exists.

**Responsibilities**

 **Company short name’s Responsibilities**

It is Company short name’s responsibility to ensure that:

* management are empowered to educate their teams on a regular basis about the existence of this Policy, and their rights and responsibilities in relation to implementing it
* persons with responsibilities under this Policy are appropriately trained to undertake such responsibilities; and
* any breach of this Policy is dealt with in a fair and consistent manner.

When a grievance is made, the People and Culture Team will determine if reasonable grounds exist to commence an investigation and will co-ordinate any such investigation.

**Managers Responsibilities**

Managers are required to:

* work with Workers to resolve grievances in a timely, sensitive, impartial and confidential manner; and
* seek support from the HR Team where required to determine if a formal investigation is required. Where an investigation is conducted, the HR Team is responsible for reviewing the recommendations of the investigation and determining the most appropriate course of action.

**Workers’ Responsibilities**

At Company short name, Workers are expected to:

* raise any grievances as soon as possible by following the processes outlined in this Policy. Workers must also be committed to working towards a solution with the assistance and support of their Manager.
* Raise grievances in good faith and not raise grievances that are frivolous or vexatious. Complaints that are found to be frivolous or vexatious may result in disciplinary action; and
* maintain the status quo while matters are being resolved, notwithstanding any risks that may exist with regards to work health and safety which Company short name will seek to minimize while matters are being resolved.
1. **Relevant Reference Material**

The following documents may provide relevant supplementary information:

* Company short name Code of Conduct
* Company short name Grievance Policy
* Company short name Privacy Policy
1. **Contact**

Should any clarification be needed for the contents of this Policy, the reader should contact your manager or the HR team via phone (Company Phone Number) or email (Company Email).

1. **Monitor and Review**

This Policy will be reviewed from two (2) years from date of adoption.

1. **Approval**

This Policy was drafted on Date and approved by [NAME], [POSITION TITLE], on [DATE].