

Conflict of Interest

Number: GOV 7

Approved by:	Board
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Version:	1.2
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Responsibility:	Finance and Administration Manager

References	N/A
Appendices	N/A

Anglican Overseas Aid (AOA) aims to conduct its activity to a high standard of personal and corporate integrity.

Principles

- AOA will make every effort to avoid conflict of interests or putting ourselves in positions where others may perceive a conflict of interest exists.
- Where a conflict of interest (actual or perceived) may exist Board, Committee and staff will identify the proposed conflict and where necessary not engage in a decision making process with respect to the conflict.
- At all times Board, Committee and staff will put the needs of beneficiaries, stakeholders and the organisation first.
- All beneficiaries, staff, donors, partners, volunteers and other stakeholders are entitled to be treated fairly and consistent with AOA's values.
- Vendors and suppliers will be selected on the basis of quality, service and cost only.
- All Board, Committee, staff and volunteers will act in a manner consistent with the vision, mission and values of AOA and will comply with the ACFID Code of Conduct to which AOA is a signatory.

Policy

AOA Board, Committee and staff are required to take reasonable steps to avoid a conflict of interest. Where a conflict of interest or perceived conflict of interest arises, the following process must be followed:

	Who to report to:	Process
Board and Committee members	To the Board or Committee applicable.	May not: <ul style="list-style-type: none">• Vote on the matter; or• Be present while the matter is being considered during the deliberative stage of the meeting, Without the consent of the Board or Committee.
Staff	The Finance, Risk and Audit Committee (FRAC) or to the CEO.	<ul style="list-style-type: none">• Any staff member who either has or is

		<p>perceived to have a conflict of interest in a matter is excluded from decision-making relating to that matter.</p> <ul style="list-style-type: none"> • FRAC will determine whether there is a conflict of interest and where necessary develop procedures for addressing particular cases.
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What is a conflict of interest?

A conflict of interest occurs where the interests or personal circumstances of an employee or Board or Committee member could influence, or could be perceived as influencing, the performance of their duties. This may lead to a sub-optimal outcome for AOA.

Examples

Conflicts of interest may arise in the following situations:

- Related party transactions that could benefit or could be perceived as benefiting Board, Committee members or staff.
- Awarding of contracts or procurement of goods and services where favour is shown to a supplier.
- Personal and family relationships of Board or Committee members or staff where a perception of unfair advantage could arise.
- Acceptance of an offer of secondary employment where engagement in outside employment is at odds with the fulfilment of the individual’s AOA responsibilities.

Specific instances and guidelines

Board and staff involvement in other aid agencies.

Directors are permitted to be involved with other aid agencies or vendors as long as this is disclosed to the Board. Staff are expected to advise their supervisor where they have, or are considering, an involvement with another aid agency or with an AOA vendor. The supervisor or manager will determine whether or not a real or perceived conflict of interest exists such as to limit, compromise, or impede the employee’s ability to carry out their duties impartially. All other Directorships by Directors are required to be disclosed on an annual basis.

Operational issues

Directors are generally not to be engaged in operational issues unless sanctioned by the Board or invited to help by the CEO or other senior staff.

Directors’ commitment of AOA resources

Individual directors are not authorised to commit the resources of AOA without the Board or CEO approval.

Gifts, entertainment and non-financial incentives

Gifts, entertainment and non-financial incentives should not be given or received if they create a feeling of obligation. Giving or accepting reasonable entertainment such as meals or events by Directors or senior staff is acceptable if it advances the work of AOA and is without conflict of interest.

Staff are not to give gifts, payments, discounts or services unless they are of nominal value and appropriate to the circumstances. Any gift or entertainment given or received by a staff member or Director in excess of \$250 should not be accepted and must be reported to the supervisor or manager, or the Chairperson and catalogued in a gift register.

Breaches

A Board or staff member who breaches this policy faces disciplinary action, which may lead to dismissal and/or legal action and/or information being passed to relevant authorities.

Any staff or Board member who suspects a breach, must in the first instance report the matter to their supervisor or to the Chairperson. No actions will be taken against a staff or Director reporting, in good faith, a breach of this policy.

Reporting

AOA will maintain the following to ensure that there is adequate transparency with respects to conflicts of interest:

- A gift register will be maintained of all gifts received;
- A conflicts register will be maintained for all instances where conflicts (actual and perceived) are disclosed by Directors and Management.

Policy version history			
Version Number	Revision Date	Author	Brief description of change(s)
1.0	January 2013	S Trimble	New policy to replace GOV 6 Board and Committee Conflict of Interest and HR 11 Staff Conflict of Interest
1.1	February 2015	B Mitchell	Qualification re deliberative phase of meeting
1.2	June 2015	B. Mitchell and S.Riley	Updates based on external review from Protiviti
1.3	June 2018	S Riley	Reviewed – no changes required