

# Anglican Board of Mission – Australia

## Policy A1005

### Conflict of Interest Policy

Adopted by the ABM Board 11 March 2016  
To be reviewed no later than 2019

---

#### 1. Commencement and application of this Policy

- 1.1 This Conflicts of Interest Policy (**'Policy'**) replaces all previous Anglican Board of Mission Australia (**ABM**) policies pertaining to conflicts of interest.
- 1.2 The Policy applies to all Board members, Committee members, employees, volunteers, agents and contractors (including temporary contractors) of ABM, collectively referred to as **'workplace participants'**.
- 1.3 ABM reserves the right to vary, replace or terminate this Policy from time to time.

#### 2. What is a conflict of interest?

- 2.1 A conflict of interest arises when a workplace participant has a *'secondary interest'* which could improperly influence the performance of the workplace participant's duties and responsibilities in their work for ABM.
- 2.2 A *'secondary interest'* means anything that can have an actual or perceived impact or influence on the workplace participant, including:
  - a) the workplace participant's own personal, professional or business interests;
  - b) the personal, professional or business interests of individuals or groups with whom a workplace participant is closely associated (for instance, relatives, friends or even a rival); or
  - c) a duty which the workplace participant owes to a third party

#### Conflicts of interests can be 'actual' or 'perceived'

- 2.3 *'Actual'* conflicts of interests arise where a secondary interest actually improperly influences a workplace participant's decisions, performance or behaviour (*"conduct"*)..
- 2.4 However, conflicts of interest may still arise even if a secondary interest does not actually influence a workplace participant's conduct. For instance, secondary interests that could create a *perception* that a workplace participant may be or has been improperly influenced in their conduct also constitute a conflict of interest.

*Example: One of your family members owns shares in a company with whom you are required to negotiate a contract on behalf of ABM, for the provision of services. This would constitute (at the very least) a perceived conflict of interest. If you own shares in the other company, that would certainly raise an actual conflict.*

#### Improper use of position, information and assets

- 2.5 This Policy also prohibits workplace participants from using their position, information acquired in their position or ABM's assets to obtain a benefit or advantage for:
- a) themselves; or
  - b) for any other person or body.

### **3. Who is responsible for managing conflicts of interest?**

- 3.1 Managing conflicts of interest is the shared responsibility of ABM, senior management, supervisors, human resources and workplace participants.
- 3.2 All workplace participants have a responsibility to ask themselves whether their actions or decisions could give rise to a real or perceived conflict of interest, and if so, to take action to manage that conflict.

### **4. Declaring a conflict of interest**

- 4.1 Avoiding all conflicts of interest (real or perceived) is not always feasible. However, in all cases where a conflict of interest arises, the conflict should be openly and transparently declared.
- 4.2 A workplace participant should register or declare the actual or perceived conflict of interest :
- a) To the next Board meeting in the case of a Board member,
  - b) To the next Committee meeting in the case of a committee member,
  - c) In writing to the workplace participant's Supervisor in the case of an employee, volunteer or contractor. If the Supervisor is also subject to the conflict of interest, the workplace participant and the Supervisor should register or declare the actual or perceived conflict of interest in writing to the Executive Director or, where the Executive Director is the Supervisor, to the Board Chair.

### **5. Managing a conflict of interest**

- 5.1 A Supervisor who receives a declaration regarding a conflict of interest must then determine how to respond to the conflict. Any response must be sufficient to ensure that ABM can continue to:
- a) perform its services in an impartial and professional manner;
  - b) maintain the highest ethical standards; and
  - c) deliver its services fairly, effectively and efficiently.

5.2 Measures that can be adopted to minimise a conflict include:

- a) restricting involvement of a workplace participant in matters in which they have an actual or perceived conflict of interest;
- b) removing the workplace participant from involvement in matters in which they have an actual or perceived conflict of interest.

**6. If in doubt, notify!**

If a workplace participant is ever under any doubt regarding whether a perceived or actual conflict of interest has arisen, the appropriate course of action is for the workplace participant to notify the circumstances following the procedures in clause 4.

**7. Breaches of this policy**

A failure to comply with the obligations contained in this Policy will lead to disciplinary action which may include, but is not limited to, termination of an employee's employment or a contractor's services or another workplace participant's appointment.