

Anglican Board of Mission – Australia
Anglicans in Development Ltd

Policy ABM1005/AID1005

Conflict of Interest

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To be reviewed no later than 2027

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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 directors, Committee members, employees, volunteers, agents and contractors (including temporary contractors) of ABM and AID, collectively referred to as '**workplace participants**'.
- 1.3 ABM and AID reserve 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 or AID.
- 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”, “Perceived” or “Potential”

- 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*, or *potential* for such influence to occur.

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.
- 2.6 For application of this Policy to the procurement of goods and services, please see ABM and AID’s Procurement Policy.
- 2.7 For application of this Policy to the receipt by ABM or AID workplace participants of gifts, please see ABM and AID’s Declaration of Gifts Policy.

3. Who is responsible for managing *Conflicts of interest*?

- 3.1 Managing *Conflicts of interest* is the shared responsibility of ABM and AID boards, 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 an *Actual, Perceived or Potential 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* (*Actual, Perceived or Potential*) 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, Perceived or Potential Conflict of interest* :

- a) To the next Board meeting in the case of a Board director,
- 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, Perceived or Potential Conflict of interest* in writing to the Executive Director or, where the Executive Director is the Supervisor, to the Chair of the relevant Board.

5. Managing a *Conflict of interest*

5.1 **A Supervisor or Board or Committee Chair 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 and AID can continue to:**

- a) perform their services in an impartial and professional manner;
- b) maintain the highest ethical standards; and
- c) deliver their 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, Perceived or Potential Conflict of interest*;
- b) **removing** the workplace participant from involvement in matters in which they have an *Actual, Perceived or Potential Conflict of interest*.

6. If in doubt, notify!

If a workplace participant is ever under any doubt regarding whether a *Potential, 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 board director or contractor's services or another workplace participant's appointment.

8. Review

This policy will be reviewed by 2027.

Policy History	
Name of Policy	Date Adopted
Conflict of Interest Policy	March 2016
Conflict of Interest Policy	December 2019
Conflict of Interest Policy	May 2022