

Conflict of Interest Policy

PURPOSE

We have an absolute obligation to declare and appropriately manage both potential and actual conflicts of interest in an effective and pre-emptive manner.

In fulfilling our commitment to RedR Australia, it is important to view a potential conflict of interest from a third party perspective. The Conflict of Interest Policy does this by defining actual or reasonably perceived conflicts, outlines the types of relationships that may be potential conflicts, and provides a management plan to resolve potential conflicts of interest.

MANDATORY REQUIREMENTS

Do What's Right

A conflict of interest is a situation in which an individual has competing interests or loyalties. A Conflict of interest arises when a worker has a secondary interest which could improperly influence work or performance matters.

All staff are obliged to make objective and unbiased decisions and judgements, and they need to be aware that a conflict of interest may consciously or unconsciously affect their ability to function objectively. As such, all employees are obligated to declare any conflicts of interest.

A conflict of interest can be actual or perceived. An actual conflict of interest is where a secondary interest improperly influences work matters. A perceived conflict of interest is where secondary interests could create a perception by others that work matters may be improperly influenced.

Employees are required at all times to Do What's Right. This means being 'faithful' to our purpose and ensuring all employee actions and decisions advance RedR Australia interests. It also means not influencing another person's decision making process to generate a particular outcome.

Application

The Conflict of Interest Policy applies to all RedR Australia employees, volunteers, contractors and anyone at RedR Australia with influence over RedR Australia assets or allocation of its resources.

Employees have an obligation to:

- Exercise their authority and duties with reasonable care and diligence
- Act in good faith in the best interests of RedR Australia
- Not improperly use their position or information to gain an advantage for themselves or someone else, or to cause detriment to RedR Australia

Conflicts of interest may exist between RedR Australia staff and clients, business associates, family, personal friends or acquaintances, and can involve:

- **Immediate family and relatives** including spouses, parents, children, siblings, cousins and relations by marriage
- **Emotional relationships** including sexual relationships and close friendships
- **Commercial relationships** involving business, monetary interests or financial dealings
- **Political memberships** and associations
- **People or groups** with a personal or professional interest

IMPLEMENTATION

1. Managing conflicts of interest is a shared responsibility of Managers and employees. All employees have an obligation to consider whether their action or decision could give rise to an actual or perceived conflict of interest.
2. If in doubt it must be declared.
3. All Conflicts of Interest must be declared in writing via a Conflict of Interest Plan which details a management plan. The management plan must ensure services and work are performed in an impartial and professional manner. It may implement risk mitigating actions, such as alternative reporting lines, or may remove an employee from a process.
4. To the extent possible, conflict of interest plans will be kept confidential.
5. If you know of a conflict of interest that you suspect is not declared with a management plan in place, you must report it to your Manager or People & Culture.
6. Employees must not service any clients that are an immediate family or relative, or those with whom they have an emotional, commercial, political or personal or professional relationship.
7. No employee shall take part in any promotion, re-classification, conflict resolution or performance management involving the other party with whom they have a conflict of interest.
8. Employees must be aware of, and comply with, any conflict of interest contractual requirements of the programmes and services (e.g. employment services, community services etc) that they support.

BREACHES OF THIS POLICY

Any employee, including Managers, who fails to declare a potential or perceived conflict of interest, may face disciplinary action up to and including termination of employment.

Document control

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REPORTING BREACHES OF THIS POLICY

Interpretation and advice on this policy can be obtained from:

Position People & Culture
Email hr@redr.org.au