



# CONFLICT OF INTEREST POLICY

**Approved: DATE**

**Due for Review: DATE**

Policy Suite – Section – Policy name

## 1. PURPOSE

The purpose of this policy is to effectively identify, disclose, and manage any actual, potential, or perceived conflicts of interest. This ensures that Quaker Service Australia (QSA) protects its interests, maintains its reputation, and upholds the trust placed in it by stakeholders, donors, and the public. This policy supports QSA's commitment to fair and unbiased decision-making without the influence of improper considerations.

## 2. KEY REFERENCES

*Financial Management Policy*

## 3. SCOPE

This policy applies to all QSA People including Board members, employees (both Australian and overseas-based), volunteers, contractors, and interns regardless of whether they are paid or unpaid. It also extends to partners and associated implementing organisations to ensure that supported projects remain free from conflicts of interest.

## 4. DEFINITIONS

A conflict of interest arises where a person's personal, professional, financial or other interests conflict, or may reasonably be perceived to conflict, with their responsibilities to Quaker Service Australia (QSA).

Given that individuals may hold multiple roles, relationships and interests across their personal and professional lives, a conflict of interest may arise in any context where those interests intersect with QSA's work. This includes activities, relationships or affiliations outside of QSA where they have the potential to influence, or be perceived to influence, decision-making, judgement or actions taken on behalf of QSA.

Conflicts of interest may be:

**Real or Actual:** A direct conflict currently exists between an individual's duties and their private interests.



**Apparent or Perceived:** A reasonable person would think that an individual's judgment is likely to be compromised, even if no actual conflict exists. Appearance of conflict is just as serious as an actual conflict because it can damage organisational reputation.

**Potential or Foreseeable:** A situation that may develop into an actual conflict in the future.

**Private Interest:** Includes personal, financial, professional, or business interests, as well as the interests of immediate family, business partners, or organisations where the individual holds a position.

## 5. POLICY STATEMENT AND PRINCIPLES

- **Impartiality:** All QSA People must remain impartial and actively manage the risk of bias in decision-making and program operations.
- **Avoidance:** Any situation creating an actual conflict or the appearance of one must be avoided if possible.
- **No Personal Gain:** No QSA People shall derive any private or personal profit or gain, directly or indirectly, through their participation with QSA outside of agreed upon remuneration

### 5.1 PERSONAL GAIN

*May encompass:*

- **Financial and Material Interests:** This includes direct financial profit, avoiding a loss, or receiving "material interests" such as hospitality, gifts, an increase in land value, money, or direct profit.
- **Non-Financial Advantages:** Gaining a "special advantage" or avoiding a disadvantage for oneself or others.
- **Associated Interests:** Gains that benefit immediate family, business partners, or other organisations where the individual holds a position
- **Future Benefits:** This can include job offers or future employment prospects that might influence current decision-making.

## 6. DUTIES AND RESPONSIBILITIES

- **Individual Duty:** It is the responsibility of every individual to be aware of their obligations, assess their own private interests, and formally disclose any conflict. All conflicts should be disclosed as soon as they arise and before any relevant decision-making.
- **Management Responsibility:** Managers must promote compliance, discuss and document management strategies with their teams, and monitor for potential conflicts of interest.
- **Executive Leadership:** The Executive Manager is responsible for managing conflicts related to staff and partners, while the Board reviews conflicts involving the Executive Manager or Board members.

## 7. DISCLOSURE AND MANAGEMENT PROCESS



**Step 1:** Disclosure Conflicts must be disclosed as soon as they are identified. For the Board, conflicts are a standing item on every meeting agenda. Disclosure should be made at the beginning of any meeting or as and when a conflict arises during the business of the meeting.

Disclosure of conflicts that arise outside of formal meetings should be disclosed to your manager, the Executive Manager or, in the case of the Board and EM to the Chair. If conflicts are disclosed in a meeting they will be recorded in the minutes, if they arise during the course of business the person with the conflict will advise the EM (or Chair in the case of the Board) in writing as soon as possible.

**Step 2:** Assessment and Management Plan Once a conflict is declared, a management plan must be developed using one or more of the following strategies as appropriate:

- Register: Formally recording the conflict to maintain transparency.
- Restrict: Placing restrictions on the individual's involvement, such as refraining from debate or abstaining from voting.
- Recruit: Appointing a disinterested third party to oversee or make the decision.
- Remove: Completely removing the individual from the matter (e.g., transferring them to a different project).
- Relinquish: The individual gives up the private interest that created the conflict.

**Step 3:** Recording All disclosures and management plans must be recorded in a centralised Conflict of Interest Register accessible to the Board.

## **8. GIFTS AND INDUCEMENTS**

Board members, staff, volunteers, contractors, and interns must not accept gifts or inducements if there is any possibility that the intent could be perceived as influencing QSA business decisions. QSA recognises that gift-giving is important in many cultural contexts and can play a role in building relationships. To balance cultural sensitivity with integrity, the following guidelines apply:

- Acknowledge Cultural Significance: Recognise that gifts may be an important part of local customs and relationship-building.
- Assess Intent and Influence: Do not accept gifts if it could reasonably be inferred that the gift is intended to influence QSA decisions or the conduct of its personnel.
- Evaluate Against Policies: Consider all gifts in accordance with QSA's Financial Management Policy when deciding whether to accept or decline them.
- Mandatory Recording: All gifts, whether accepted or declined, must be entered into the Gifts Register.
- Seek Approval: Staff should obtain approval from their manager for gifts received during work activities to ensure transparency. Board members should seek approval from the Chair.
- Maintain Impartiality: No individual may gain personal profit from their association with QSA; gifts must not compromise fair and unbiased decision-making.



By following these principles, QSA can respect cultural practices while upholding its commitment to ethical, impartial, and transparent operations.

## **9. RELATED PARTY TRANSACTIONS**

QSA will disclose related party transactions, including transfers of resources, services, or obligations between the organisation and a related party (e.g., a Board member or their family business), regardless of whether a price is charged. These must be disclosed and recorded in the same manner as other conflicts.

## **10. VIOLATIONS AND SANCTIONS**

Failure to disclose a conflict of interest, or providing incomplete or inaccurate information, is a breach of this policy. Such breaches may result in disciplinary action, up to and including termination of employment or engagement.

## **11. MONITORING**

The Conflict-of-Interest Register will be monitored regularly by the Executive Manager and reported to at Board Meetings as and when any significant conflicts of interest arise.

## **12. REVIEW**

This policy will be reviewed by the Board every three years, or sooner if required by regulatory changes.