

CONFLICT OF INTEREST POLICY

Compliance with this policy is mandatory.

This policy gives guidance to and outlines expectations of employees in identifying and managing potential and actual conflicts of interest. All Save the Children Australia (SCA) employees and representatives, which includes expatriates, in-country employees, Board members, volunteers, ambassadors, consultants, temporary staff and visitors, are required to adhere to this policy and to proactively identify conflicts of interest.

Definition: what is a conflict of interest?

A conflict of interest is a situation in which an individual has competing interests or loyalties. A conflict of interest can exist in many different situations and it is typically when someone has an interest (personal, professional or financial) in an organisation, relationship, activity or decision that may impact their impartiality in carrying out their responsibilities in SCA.

A perceived conflict of interest occurs when others identify **that an individual's interests or relationships** appear inconsistent with their ability to perform their role with adequate objectivity and impartiality. The perception of a conflict of interest is a concern because it may damage the reputation of the organisation and/or damage the reputation of an individual within the organisation. For this reason, even when unsure of a conflict of interest, or concerned about the perception of a conflict of interest, it is best to raise this to the organisation.

Anyone at any level can have a conflict of interest. Many SCA employees are involved in networks and partnerships including community organisations, government, corporate, advocacy and philanthropic and other organisations and this is frequently an important part of their work and/or professional development. SCA encourages employees to be actively engaged in a broad range of networks. At times these associations can create an actual or perceived conflict of interest. If unsure, employees should discuss with their manager and, if in any doubt, complete the [Conflict of Interest Disclosure Form](#).

Examples of conflicts of interest: (these are examples only and not an exhaustive list)

- Having a direct or indirect interest in an organisation with whom SCA does business e.g. a supplier or partner organisation
- Hiring, managing or being involved in employment decisions of a family member, friend or associate
- Involvement in a close personal relationship by two employees and/or representatives of SCA, particularly where there is a reporting relationship or where the two parties may both be part of a decision-making team
- Use of SCA resources (including paid staff time, equipment, materials or any other resources) for non-SCA related gain
- Accepting gifts, hospitality or other benefits from a supplier, especially during contract negotiations (small tokens of less than \$50 may be accepted outside of these situations but need to be declared and would ideally be distributed across the team so the value to any one individual is incidental)
- Participating in a tender process where there is a vested interest in one of the participating organisations
- Involvement in professional activities that take time away from the execution of your position with SCA – this includes things like running a family business, having a second job, being a board member

Addressing a conflict of interest

A conflict of interest is not necessarily a problem. Conflicts and potential conflicts are not unusual and can generally be managed by putting in place simple measures and ensuring appropriate communication.

The process for raising a conflict is to complete the [Conflict of Interest Disclosure Form](#) which will be reviewed in the first instance by the People and Culture team. Where required, this may include review by SCA Legal Counsel, the Executive and/or the Board of Directors.

Conflicts of interest can be managed when identified and disclosed. The [Conflict of Interest Disclosure Form](#) is used by SCA to assess and help the organisation and the individual manage an actual or perceived conflict of interest.

Where a conflict of interest pertains to a Board decision, the interested person(s) must advise the Board in advance and absent themselves from the deliberation and/or voting on the matter. Where there is doubt as to whether a conflict exists, the matter shall be resolved by vote of the Board of Trustees.

The official minutes of the Board shall reflect that the conflict of interest was disclosed and the interested person(s) did not participate in the final discussion or vote and did not vote on the matter.

Any SCA employee or representative behaving contrary to this policy may be subject to disciplinary action, up to and including dismissal.

This policy is to be read in conjunction with all SCA policies, procedures and guidelines.

Review date	Current version	Comments	Author	Approved by Executive Committee	Approved by HR Board Committee	Review date
	1.0	New policy established	B. Bacon	Q1 2011	Q1 2011	Q1 2013
Q1 2013	1.0	Policy reviewed, no changes made	T. McMillan	Q2 2013	Q2 2013	Q2 2015
Q2 2015	2.0	Changed to new format, consolidated content	D. Francois	Q2 2015	Q2 2015	Q2 2017
Q2 2017	3.0	Changed to new format, consolidated content	D. Francois	Q2 2017	Q2 2017	Q2 2019
Q3 2018	4.0	Updated policy format, no other changes	D. Francois	N/A	N/A	Q2 2019
Q3 2019	5.0	Reviewed – no changes required	A. Denvir	20/8/19	18/9/19	Q3 2021