

Appendix 8. Conflict of Interest Policy

(Next review by March 2027)

Policy number	8	Current policy version	4
Original policy approved	July 2012	Previous review date	Oct 2017
Current policy reviewed by CEO	PI	Current version approved by Committee of Management on	Mar 2024
Responsible person	CEO	Scheduled review date by	Mar 2027

Introduction

Committee of Management members and Assisi Aid Projects (Assisi) staff (hereinafter referred to as “personnel”) may encounter conflicts of interest when participating in Assisi’s decision-making processes, as other professional or personal roles intersect.

Potential areas where a conflict of interest may arise include but are not limited to:

- Recruitment of staff or contractors.
- Proposals to undertake projects or enter partnerships.
- Relationships with suppliers of goods and services.
- Representing Assisi in other forums with which there may be a financial or non-financial connection.
- A direct family member of personnel receives a financial or non-financial benefit from the organisation.
- The organisation enters a contract with a business owned, conducted by the member of personnel or a relative of the member of personnel.
- The member of personnel uses or has a business or personal relationship with someone who is using the services of the organisation.
- The member of personnel has a position of some kind (e.g., as a Board member) of another entity which may create a conflict of loyalties (e.g., if a member of personnel was a director of another Not-for-Profit organisation that was competing for the same limited pool of funding).

It is important to note that a perceived conflict of interest can be highly damaging to organisational reputation and creates the potential for perceived fraud so is also included

in the management of conflicts of interest under this policy.

Purpose

The management of conflicts of interest is central to the integrity of the organisation. This policy is to ensure good governance principles are embedded in Assisi's management and operations. That is, decision-making processes are based on evidence and in the best interests of the organisation, independent of external influences such as personal or professional interests.

Scope

This policy applies to all Assisi staff members, Governing Body members (including both Committee of Management and subcommittee members), volunteers, interns, representatives, contractors, and visitors to project sites (hereinafter referred to as "personnel").

In addition, Assisi will support in-country partners to understand the principles of this policy, and to practically implement conflict of interest procedures in their local context.

Policy

This policy extends to two areas of Assisi's work: in Australia, and overseas.

Conflict of interest in Assisi's work in Australia

Assisi expects that all personnel are mindful of potential conflicts of interest and declare a conflict of interest before it arises or immediately on becoming aware of it.

In general, a conflict of interest can be said to arise if it is likely that the performance of a person's duties could be, or could be seen to be, prejudicially influenced by that person's private or personal interest.

Assisi encourages and supports personnel to become involved in community activities and volunteer work in their personal lives. However, it is possible that personnel may undertake volunteer or professional roles outside Assisi that give rise to a conflict of interest, or a perception of conflict (e.g., staff undertaking consultancy work).

In order to avoid conflicts of interest Assisi personnel will:

- Declare a potential, real or perceived conflict of interest immediately on becoming aware that a such a conflict has occurred or on becoming aware that it may occur.
- Openly declare a potential or real conflict of interest prior to engaging in a decision-making process.
- Declare any interests in contracts.
- Abstain from participating in discussions or voting on the matter (for Committee of

Management or sub-committee members).

- Not authorise or approve payments where they are the recipient of the payment or where there is a conflict of interest in relation to the recipient.
- Abstain from making decisions that bind Assisi in any way (for Assisi staff) where there is a conflict of interest or a potential or perceived conflict of interest.

All non-Committee of Management personnel will:

- Take appropriate action in consultation with the Chief Executive Officer (CEO). For instance, a staff member may need to withdraw from a particular selection panel or committee where their participation presents a real or perceived conflict of interest.
- Declare to the CEO involvement in external activities related to the work of Assisi when they are employed and discuss and plan with their supervisor how any potential conflicts of interest can be managed.
- Inform the CEO if they take on other (new) work, of either a paid or volunteer nature, outside Assisi.
- The CEO will consult with the President of the Committee of Management about any potential conflict of interest and then take appropriate action.

Conflict of interest in overseas programs supported by Assisi

Assisi actively encourages partners to be mindful of potential conflicts of interest, and has implemented the following procedures to support this:

- Partners must follow procurement procedures that include obtaining multiple quotes for expenses over a particular amount and providing documentation of purchases made with project funds.
- The Memorandum of Understanding between Assisi and partners includes a clause that specifies:
 - Board members, staff and volunteers will make known any conflict of interest or any affiliation they might have with any supplier of goods and services or organisation with competing objectives.
 - Board members/ trustees or their family members cannot undertake any paid work or consultancies related to Assisi projects or its partners.

Responsibilities

As outlined in the Policy Overview, there are roles and responsibilities that apply to all policies. In addition, the following apply specifically to this policy.

Responsibilities of the Chief Executive Officer:

- Proactively put in place the measures outlined in this policy to ensure transparency

and accountability around conflict of interest for Assisi in its work in Australia and to support its partners to do likewise.

Related Documents

Assisi – Code of Conduct

Assisi – Constitution: Statement of Purposes and Rules.

ACFID – Code of Conduct

ACNC - Governance Standard 5 - <https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/5-duties-responsible-people>