

Conflicts of Interest

WaterAid Australia

Document control

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Related Policies/Procedures/Guidance Notes

Title	Date	Version

1. Purpose

WaterAid Australia is committed to ensuring that any Conflicts of Interest are effectively identified, declared and managed so that they do not affect the services, activities, decisions, integrity or reputation of the organisation, or the duties and responsibilities of employees. This policy provides for the identification, disclosure and resolution of conflicts of interest, including actual, potential and perceived.

2. Scope

This policy applies to all Board Members, Committee Members, Executives, Employees, Volunteers, Students, Contractors and Consultants.

3. Definitions

Conflicts of Interest: A clash between a staff member's personal interests and work interests that gives, may give, or may be perceived to give, advantage to the staff member, or to others who are associated with the staff member. It may be Actual, Potential or Perceived Conflict of Interest.

Actual Conflict of Interest: Where a staff member is being influenced by a conflicting interest.

Potential Conflict of Interest: Where a staff member could be influenced by a conflicting interest.

Perceived Conflict of Interest: Where a staff member could appear to be influenced by a conflicting interest.

Non-Pecuniary Interest: A Personal Interest without a financial component where there may be a tendency for favouritism or prejudice to arise due to friendship, animosity or other personal involvement with another person or group.

Pecuniary Interest: A Personal Interest involving actual or potential financial gain or loss by a staff member, or a staff member's relative, or a staff member's close associate (that owns property, holds shares, or is associated with a firm bidding for WaterAid work).

Personal Interests: Direct interests, including those of individuals, groups or organisations that a staff member associates with outside of WaterAid Australia.

Staff: Any person performing work for WaterAid Australia regardless of whether it is paid or voluntary. All Board Members, Committee Members, Executives, Employees, Volunteers, Students, Contractors and Consultants are Staff for the purposes of this Policy to the extent that they contribute to work Interests

4. Policy

WaterAid Australia is committed to ensuring that any Conflicts of Interest are effectively identified, declared and managed so that they do not affect the

services, activities, decisions, integrity or reputation of the organisation, or the duties and responsibilities of employees.

Identifying and Declaring a Conflict of Interest:

4.2.1 A conflict may be Actual, Perceived or Potential, and the conflict may be Pecuniary or Non-Pecuniary in nature.

4.2.2 Staff have an obligation to avoid Conflicts of Interest. However, WaterAid Australia recognise that the existence of a Conflict of Interest is not uncommon. What is important is how a conflict is managed.

4.2.3 When you become aware that you may have a Conflict of Interest, you must report this to your Manager or the appropriate level of management.

4.2.4 When Board Members or Board Committee Members have a Conflict of Interest, they must report it to the meeting members and the relevant Chair must ensure its recorded in the meetings minutes.

4.2.5 All staff who identify improper conduct in relation to a Conflict of Interest are encouraged to speak up and report the matter to their Manager or another appropriate manager.

5. Breach of Policy

A staff member's failure to disclose a Conflict of Interest is a breach of the Code of Conduct and may result in disciplinary action that may involve dismissal from the organisation. For Board Members and Committee members, this is a breach of the Code of Conduct and Governance Manual.

If there is reason to believe that a staff member has failed to comply with this Policy, the circumstances will be investigated. If it is found that a staff member has breached this Policy disciplinary action may be actioned.

6. Responsibilities

6.1 Everyone in WaterAid Australia is responsible for identifying, disclosing and resolving Conflicts of Interest. Specific responsibilities are:

Board Members and Committee Members

- Be aware when Conflicts of Interest arise to ensure conflicts are disclosed, managed and resolved, with all pertinent details recorded in meeting minutes.
- Monitor compliance with this Policy

Company Secretary

- Receive Conflict of Interest notifications from Board Members and Committee Members and register in the relevant Director and Committee members register of interests.

Chief Executive Officer

- Provide leadership in implementing, communicating, reviewing, giving effect to and facilitating compliance with this Policy.
- Perform periodic reviews of the Conflict of Interest Register to identify patterns or trends which may need organisation wide action

Executive Leaders and Managers

- For those they supervise:
 - o Identify Conflicts of Interest
 - o Formulate management and communications strategies to resolve any identified Conflicts of Interest
 - o Document and register any Conflicts of Interest identified in the Conflicts of Interest Register
 - o Periodically review (at least annually) ongoing Conflicts of Interest and the appropriateness of the management and communications strategies
 - o Participate in Conflict of Interest resolution
- Take appropriate action for breaches of this Policy

People and Culture

- Receive Conflict of Interest notifications
- Review the effectiveness of management strategies.
- Register all Conflicts of Interest in the Conflict of Interest Register

Staff members

- Be aware of Conflicts of Interest that might affect them.
- Disclose Conflicts of Interest to their Manager
- Document and register the management and communication strategies for any Conflict of Interest in conjunction with their Manager.
- Speak up to advise your Manager or a People Leader if you see an Actual or Potential Conflict of Interest that may not be appropriately managed.
- Manage these conflicts as required by management plans and notify their Manager of any changes.