

# Procedure

## Conflict of Interest Procedure

Applies to:

This procedure applies to all Wesley Mission Queensland Limited's (WMQ) workforce including employees, contractors, consultants, students and volunteers across all services of WMQ.

### Purpose and rationale

At Wesley Mission Queensland Limited (WMQ), we strive to have fair, well-informed decision-making that is not influenced by conflicting interests. We believe that managing conflicts (actual, perceived and potential) are critical to our success and to achieving the desired outcomes of *The Wesley Charter* and the *WMQ 2035 Strategy*.

This procedure outlines how WMQ's workforce identify, disclose and manage any actual, perceived or potential Conflicts-of-Interest.

### Position statement

WMQ is committed to maintaining the highest standards of integrity, transparency, and accountability in all business activities. We recognise that Conflicts-of-Interest can arise in various forms, including financial interests, outside employment, family relationships, or personal affiliations. While such situations are not inherently unethical, they must be disclosed and managed appropriately to protect WMQ's reputation and ensure decisions are made in its best interest.

### Process

#### Conflict-of-Interest avoidance

Where possible you should avoid conflicts-of-interest. You should avoid being in a situation where you can act, make a decision or influence any action or decision of WMQ that involves a Conflict-of-Interest or related party transaction, or the reasonable perception of a Conflict-of-Interest. You should also avoid conflicts of commitment that impair your ability to perform your role.

#### Unavoidable Conflicts-of-Interest

All personnel are expected to take reasonable steps to disclose any Actual, Potential or Perceived Conflicts of Interest, ensure the responsible management of the organisation's financial affairs, and act honestly and fairly in the best interests of WMQ and its charitable purpose.

Extending the principles of effective management of Conflicts of Interest to WMQ's workforce supports organisation-wide strong governance practice.

#### How to disclose

Where a conflict-of-interest cannot be avoided or is identified – the following principles should be followed - Identify, Disclose, Assess and Manage.

##### *Identify*

Individuals must actively assess their circumstances for actual, potential, or perceived conflicts, including:

- Financial interests
- Personal or family relationships
- Outside employment or business interests

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- Gifts, benefits, or hospitality they may be offered
- Access to confidential information as part of their role.

This should be discussed immediately with your Reporting Line Manager.

Where Reporting Line Managers identify conflicts-of-interest for their staff, Reporting Line Manager should instruct the workforce member to disclose the conflict.

### Disclose

- In consultation with your Reporting Line Manager, you should complete the *Conflict of Interest Disclosure Form*.
- Where possible, disclosures of Conflict-of-Interest should occur in advance. We understand that proactive disclosure cannot always occur, however it is important that you disclose it as soon as it is identified. Where this proactive disclosure cannot or does not occur, conflicts must be disclosed promptly, fully, to your Reporting Line Manager and Conflict-of-Interest Officers by emailing [conflictofinterest@wmq.org.au](mailto:conflictofinterest@wmq.org.au).
- There is an ongoing obligation of disclosure from WMQ's workforce in relation to Conflicts-of-Interest.
- The workforce also has an obligation to notify the Conflict-of-Interest Officers when a conflict ends. This can be completed by emailing [conflictofinterest@wmq.org.au](mailto:conflictofinterest@wmq.org.au).
- Timely disclosure of conflicts demonstrates strong governance, ensures transparency and maintains public trust.

### Assess

The Reporting Line Manager will first assess the disclosed Conflict-of-Interest and propose strategies to manage the conflict. This will be documented on the *Conflict of Interest Disclosure Form*. The form includes:

- Nature and details of the conflict
- The nature and level of risk
- Whether it is manageable, must be avoided, or requires removal from certain work locations, decisions or discussions.

The Conflict-of-Interest Officer will review and approve the disclosed conflict. This review may include additional management strategies to be accepted by the workforce member.

### Manage

After identifying and disclosing a conflict-of-interest, the management strategies must be implemented fully.

The management strategy should include:

- A description of your personal interest
- The interest/s of WMQ with which your personal interest does or could conflict
- The likelihood of the interests coming into conflict
- Decisions or actions which you agree to avoid doing and participating in
- Decisions or actions which are agreed you can take or do.

Appropriate conflict-of-interest management strategies may include:

- Restricting access to information
- Recusal from decision-making and discussion
- Reassignment of duties
- Inability to participate in interviews, recruiting or human resources related matters

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- Inability to approve payments to or rosters and timesheets
- Changing work locations
- Divestment or termination of the conflicting interest (where necessary).

As soon as you become aware that you have a conflict of interest or a potential conflict of interest in the process of negotiating or making a decision on a transaction or other action in your professional capacity, you must immediately declare it and, unless resolved, take no further part in any negotiation or decision on the subject.

### Maintaining the Conflict-of-Interest Register

The Conflict-of-Interest Officers are responsible for maintaining a register that reflect Conflicts-of-Interest disclosed by the workforce. The register will include:

- A summary of the identified conflict
- Whether the conflict is actual, perceived, or potential
- A brief summary of the management strategies
- The date of disclosure and the potential end date
- The end date of a conflict and archiving from the register.

The register will be made available to the Executive Leadership Team quarterly to support implementation of management strategies.

### Examples of disclosable Conflicts-of-Interest

If you:

- or an immediate family member has a direct or indirect financial interest, or holds a directorship, in a company which supplies goods and/or services to us, or which operates in competition with us
- accept gifts of value, grants and/or favours from people who would benefit from influencing our workforce such as our customers, job applicants or suppliers
- are involved, or perceived to be involved, directly or indirectly in admitting a relative to any of our services
- recruit, supervise, promote, reclassify, evaluate or handle grievances of prospective or current employees with whom you have or have had a close personal relationship (e.g. partner, sibling, parent etc)
- use WMQ assets or confidential organisational information for your personal gain, or for the benefit of a person you have a close personal relationship with, or an organisation you have a non-financial or financial interest in
- assess a tender application submitted by someone you have or have had a close personal relationship with a person or by an organisation you have a non-financial or financial interest in
- do research/clinical trials which are sponsored by a company in which the researcher (or an associate of the researcher) has a financial interest or holds an executive position
- do paid or unpaid work outside of WMQ that impacts your ability to perform your role and obligations for WMQ.

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## Conflict-of-Interest Officers

WMQ's Conflict-of-Interest Officers are:

- General Manager – Risk & Assurance
- Principal Advisor – Compliance
- Director – Governance, Performance & Outcomes.

These officers are available for advice on Conflicts-of-Interests are identified. Advice on management strategies can also be provided. It is important to communicate with these officers to ensure transparency and effective management of conflicts.

## Roles and responsibilities

Position Title	Responsibilities under this procedure
Workforce	<ul style="list-style-type: none"> <li>• Comply with this procedure and over-arching policy</li> <li>• Complete annual training on Conflicts-of-Interest</li> </ul>
Reporting Line Manager	<ul style="list-style-type: none"> <li>• Provide advice to their workforce</li> <li>• Support proactive identification and disclosure of Conflicts-of-Interest</li> <li>• Review and approve Conflict-of-Interest Disclosure Forms</li> <li>• Seek advice from the Conflict-of-Interest Officer as necessary</li> <li>• Support the implementation and compliance with this procedure and overarching policy</li> </ul>
Conflict-of-Interest Officer	<ul style="list-style-type: none"> <li>• Provide advice to the workforce and reporting line managers</li> <li>• Review and approve Conflict-of-Interest Disclosure Forms</li> <li>• Maintain the register of Conflicts disclosed</li> <li>• Report high or extreme risk Conflicts-of-Interest to General Managers and Executive Leadership Team members</li> <li>• Support the implementation and compliance with this procedure and overarching policy</li> </ul>
Executive Leadership Team	<ul style="list-style-type: none"> <li>• Support the implementation and compliance with this procedure and overarching policy</li> <li>• Seek advice from the Conflict-of-Interest Officer as necessary</li> <li>• Consult the Conflict-of-Interest Officer where necessary</li> <li>• Support identification of Conflicts-of-Interest</li> <li>• Monitor the register of Conflicts-of-Interest</li> </ul>

## Definitions

Term	Definition
Conflict-of-Interest	<p>A situation where a conflict arises for an individual between two competing interests. These are often, but not exclusively, interests of official duty versus private interests. These interests could improperly influence—or appear to influence - professional judgment, decisions, or actions taken on behalf of the organisation. A reference to Conflict of Interest can include Perceived, Potential or Actual Conflict-of-Interest.</p> <p>Conflicts-of-Interest can involve financial or non-financial interests of the workforce member and the interests of a business partner or associate, family member, friend or person in, or has had a close personal relationship with the workforce member. These may be referred to as 'related parties'.</p>

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Term	Definition
Actual Conflict-of-Interest	<p>An actual Conflict-of-Interest exists when a person's interests interfere with their professional duties or responsibilities. This means the conflict is real and present, not hypothetical.</p> <p><i>Example:</i> An employee is responsible for selecting a supplier and chooses a company owned by a family member.</p>
Perceived Conflict-of-Interest	<p>A perceived Conflict-of-Interest occurs when others might reasonably believe that a person's personal interests could influence their professional judgment, even if no actual conflict exists.</p> <p><i>Example:</i> An employee socializes regularly with a vendor, leading others to question impartiality in procurement decisions.</p>
Potential Conflict-of-Interest	<p>A potential Conflict-of-Interest arises when a situation could reasonably develop into an actual conflict in the future. It is not currently impacting decisions but has the capacity to do so.</p> <p><i>Example:</i> An employee is offered a part-time role with a competitor but has not yet accepted.</p>