

WMQ Procedure

Conflict of Interest Procedure

Purpose and rationale

The purpose of this procedure is to make sure the Wesley Mission Queensland (WMQ) workforce understands their responsibilities regarding conflicts of interest. A conflict of interest is a situation where you have may have interests or priorities that compete with those of WMQ.

This procedure outlines the process for managing conflicts between your own interests and those of your WMQ duties and responsibilities. It is supported by our *Conflict of Interest Policy* and our *Corporate Sustainability Policy Statement*.

Scope

This procedure applies to all employees, contractors and volunteers at Wesley Mission Queensland, including our Board members.

Process

Avoiding conflicts of interest

You must avoid being in a situation where you can take action, make a decision or influence any action or decision of WMQ that involves a conflict of interest, or the reasonable perception of a conflict of interest. You must also avoid conflicts of commitment that impair your ability to perform your role. For example, 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.
- 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.

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.

We administer an annual Declaration of Private Interests process in July each year for Board Members and the Senior Management Team (the Executive Leadership Team and managers who hold financial and other legal delegations).

Board members should refer to the Governance Manual and WMQ Board Terms of Reference.

Disclosing conflicts of interest

You should always aim to disclose potential conflicts of interest **in advance**. If you do not disclose a potential conflict of interest, we may regard it as misconduct.

If you believe or suspect that a conflict of interest exists or may exist, you must immediately disclose any conflict of interest to your manager using the *Disclosure of Conflict of Interest Form*.

If you are not sure if there is a conflict of interest, ask your manager or Director. If they believe a conflict of interest exists, they will direct you to complete a *Disclosure of Conflict of Interest Form*.

Managing conflicts of interest

After you have identified a conflict of interest and submitted the *Disclosure of Conflict of Interest Form*, you and your manager or Director must develop a plan to resolve or manage the conflict of interest.

The plan should include:

- 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 it is agreed you can take or do.

To develop this plan, you or your manager or Director may consult with the Conflict of Interest Advisory Officer (CIAO) for guidance and assistance via conflictofinterest@wmq.org.au

The agreed final plan must be:

- Signed by you and your manager and/or Director and placed on your personnel file
- Recorded in the Wesley Mission Queensland “*Notified Conflict of Interest Register*”
- Reviewed every year at the time of performance appraisal or otherwise as appropriate.

We will mark all documents “confidential” and restrict access to include only employees who need access for official purposes.

Managing potential conflicts of interest

If there is disagreement about potential or actual conflict, you must outline in writing all the relevant facts, including the people involved, the nature of the conflict of interest, and the reason(s) for the disagreement and send it to the CIAO at conflictofinterest@wmq.org.au. The CIAO will attempt to resolve any disagreement or refer it to the Chief Executive Officer.

Complying with the conflict of interest procedure

If you do not follow this procedure, we may take formal performance management action in line with the relevant enterprise agreement and your contract of employment, including possible dismissal in cases of serious conflict of interest or other serious misconduct.

Roles and responsibilities

Position Title	Responsibilities under this procedure
WMQ Workforce	<ul style="list-style-type: none"> ■ Work to understand and comply with this procedure ■ Assess your own private and personal interests and whether they conflict or have the potential to conflict with the organisation’s interests, including your own duties as a member of our workforce ■ Declare and manage any actual or potential conflicts of interest
Managers and Directors	<ul style="list-style-type: none"> ■ Understand and comply with this procedure ■ Ensure the workforce in your area are aware of the procedure

Position Title	Responsibilities under this procedure
	<ul style="list-style-type: none"> ■ Be aware of areas of conflict of interest in your area of responsibility, assess the risks and advise the CIAO or relevant Director ■ Disclose any conflicts of interest; ■ Assist anyone who has queries about potential or actual conflicts of interest ■ supporting people in your team to manage any actual or potential conflicts of interest ■ Seek advice or support from the CIAO where necessary.
Conflict of Interest Advisory Officer (CIAO)	<ul style="list-style-type: none"> ■ Alert the relevant Director and Chief Executive Officer to any identified instances of conflicts of interest ■ Receive queries in relation to conflicts of interest ■ Provide advice to involved parties on the management of conflict of interest ■ Assist in the resolution of disputes regarding identified conflicts of interest that are unable to be resolved between the relevant parties ■ Refer matters which cannot be resolved immediately to the Chief Executive Officer ■ Reviewing the application of this Conflict of Interest procedure annually ■ Ensure provision of appropriate training including induction training for the workforce.
Chief Executive Officer	<ul style="list-style-type: none"> ■ Receive reports from the CIAO in relation to conflicts of interest (including any identified institutional conflicts of interest) ■ Advise the CIAO on whether a conflict of interest exists ■ Provide direction in relation to the way in which the conflict of interest is to be managed ■ Build an organisational culture that supports implementation this procedure with guidance, training and fair enforcement of the procedure ■ Report annually to the WMQ Board on the operations of the procedure.