

# Conflict of Interest Policy

VolunteeringACT is committed to ensuring that actions and decisions taken in the Strong and Resilient Communities – Community Support – Small Grants for Volunteer Involving Organisations Activity are objective, fair and free from undisclosed conflicts of interests or mismanaged conflicts. VolunteeringACT staff, volunteers, Assessment Panel Members, and on-funded grantees must not engage in activities or decision making where there is a conflict between their personal interests and the interests of VolunteeringACT or the Department of Social Services (the Department), without prior disclosure and approval.

A conflict of interest may arise when someone has private or personal interests that may affect (or be perceived to affect) their ability to act in the best interests of their organisation and the grant program. In relation to this particular grant, it may also arise where on-funded grantees choose to engage the services of VolunteeringACT to deliver activity funded by the grant

Conflicts of interest must be identified and action taken to ensure that personal interests do not impact on the services, activities or decisions for any party.

## Definitions

### Conflict of interest

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of the organisation or activity. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in. It also includes a conflict between VolunteeringACT's duty to the Department and their duty to volunteer-involving organisations in the region. A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

## Disclosure of conflicts

Any personnel involved in the program including VPB Staff, volunteers and assessment panel members, and all relevant staff and volunteers at the funded organisation must declare:

- Actual, potential or perceived conflicts of interest that exist at the time of commencing engagement with the program or those which arise during engagement with the program immediately at the time they arise.

Notification must be in writing (e.g. email or declaration form) or recorded in meeting minutes if the conflict is declared during a grant related meeting. With the exception of any public disclosures that VolunteeringACT is legally required to make, all information provided in relation to any declaration of a conflict will be treated in accordance with VolunteeringACT's privacy policies.

A *Register of Conflicts of Interest* will be maintained by the ACT Program Representative and will record information related to a conflict of interest, including the nature and extent of the conflict and any steps taken to address it.

## Management of conflicts of interest

### Assessment Panel

A member of the Assessment Panel who has a material personal interest in a matter being considered at a meeting of the Panel must not be present while the matter is being considered at the meeting or vote on the matter.

If the personal interest disclosed is not considered material, the Assessment Panel (excluding the Panel member disclosing and any other conflicted Panel member) must decide whether or not those conflicted members should:

- vote on the matter,
- participate in any debate, or
- be present in the room during the debate and the voting.

The approval of any action requires the agreement of a majority of the Assessment Panel (excluding any conflicted Panel member/s) who are present and voting at the meeting.

The action and result of the voting will be recorded in the minutes of the meeting and in the *Register of Conflicts of Interest*.

Where a conflict is significant or likely to prevent an Assessment Panel Member from regularly participating in discussions, the Assessment Panel may consider whether it is appropriate for the person conflicted to resign from the Assessment Panel. An independent probity advisor will attend all panel meetings to provide assurance to the management of conflicts in these settings.

### Staff and volunteers

The ACT Program Representative will assess the conflict of interest held by a staff member or volunteer and determine required action. In the case of conflicts of interest held by the Program Representative, this assessment will be undertaken by the CEO, who may refer the matter to their own board if necessary.

Required actions to manage the conflict may include:

- contribute to the discussion but abstain from voting or decision making on the matter
- observe but not take part in the discussion or decision making
- leave the meeting during discussion and decision on the matter
- remedial action to remove the conflict e.g. change of duties.

If a conflict of interest is disclosed that affects a staff member, volunteer, or Assessment Panel Member's ability to perform their role, the conflict must be reported to the Commonwealth, through the Department of Social Services within 30 business days, including an explanation of how the conflict was managed.

### Grantees Procuring Volunteering Peak Bodies to Provide Capacity Building Training and Support

Volunteering Peak Bodies will not advertise or promote that they are able to provide capacity building training and support through funding received through this Grant process, however it is possible that this may be an activity listed in proposals

If an organisation proposes to use this funding to procure volunteering peak body services, the peak body will notify the Department and provide justification for why the peak body is best placed to deliver this service and how the peak body proposes to manage the request. This notification will include information on how the service contributes to the outcome of volunteer capacity building and confirming it is in line with the Grant Opportunity Guidelines. These occurrences will be included in the peak bodies Register of Conflicts of Interest.

## Compliance

If the ACT Program Representative has a reason to believe that a person subject to this policy has failed to comply with it, the CEO will be responsible for investigating the circumstances and taking necessary actions.

If a person suspects that the CEO has failed to disclose a conflict of interest, the relevant policies will be followed in that VPB.

## Responsibilities

VolunteeringACT staff, volunteers, Assessment Panel members and relevant staff at the on-funded organisations are required to always act in the interests of their own organisation, and:

- avoid conflicts of interest where possible
- identify and declare any potential or actual conflict of interest
- comply with this policy.

The ACT Program Representative is responsible for:

- ensuring the independent probity advisory is present at all grant panel meetings and reviews all relevant grant documentation
- ensuring all relevant VolunteeringACT staff, volunteers, grant panel members and contractor are aware of and comply with this policy
- receiving, recording and reporting on disclosures of potential or actual conflicts interest
- ensuring that declared conflicts of interest are managed and controlled in line with this policy.

The Assessment Panel and Program Representative are responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest
- monitoring compliance with this policy.