



Policy Number	SAID 13.02.04
Policy Name	Conflict of Interest
Chapter	Management Systems
Release No.	4 (this replaces all previous releases of this policy)
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02.04.01 Policy

The Salvation Army International Development Office (SAID) will uphold ethical standards by disclosing and addressing all actual, potential or perceived conflicts of interest. SAID policy on this matter reflects and abides by The Salvation Army "Conflict of Interest Minute" COI0411 as well as the relevant NSW legislation.

02.04.02 Rationale

Effective management of conflicts of interest will ensure transparency of our operations for all stakeholders.

02.04.03 Procedure

Definitions

Conflict of Interest Relationship

Exists where there is a connection, association or involvement with others, past or present, which may inhibit necessary objectivity.

A conflict of interest may be actual, perceived or potential.

- Actual:
 - o Involves a direct conflict between a person's current duties and or/responsibilities and existing private interests.
- Perceived:
 - o Conflict exists where it could be perceived or it appears that private interests could improperly influence the performance of duties whether or not this is in fact the case.



- Potential:
 - o Rises where private interests could conflict with official duties.

Conflict of Interest - Business

Where a person or persons associated with the SAID Office stands to gain or lose, personally or financially, through employment, contractual arrangements, use of facilities or any other aspect of the site's operations.

All SAID Executive Board members are required to complete the Register of Interests – SAID Executive Board (Appendix A) upon appointment. The completed Register will be reviewed at least annually and members are responsible for updating the register throughout the year if there are any changes.

A business conflict of interest also extends to immediate members of a family of staff and/or the SAID Executive Board, who stand to gain or lose in the same manner.

Examples include but are not limited to:

- Choice of suppliers (supermarket, chemist, fuel etc...) where there is a relationship between the proprietor and the staff member
- Rental / lease of property related to the Centre where there is a relationship between the lessor or estate agent and the staff member
- Choice of external evaluation, where there is a relationship to any key stakeholder of a SAID funded project or to Salvation Army leadership where the evaluation is being conducted.

General Procedure

The policy applies to SAID Executive Board members, SAID staff, officers, volunteers and partners.

All SAID staff are required to be vigilant in identifying and informing the Director of SAID when they perceive or establish that a conflict of interest exists, whether it is related to them personally or to a partner, another employee or volunteer.

The Director of SAID is responsible for managing and developing an action plan to respond to the conflict of interest for all SAID employees, officers, volunteers and partners, ensuring that the ethical, employment or legal responsibilities of the organisation are upheld.

The Chief Secretary of The Salvation Army is responsible for managing and developing an action plan to respond to the conflict of interest for all SAID Executive Board members and ensuring that the ethical, employment or legal responsibilities of the organisation are upheld. The Chief Secretary can, however, delegate this responsibility to the SAID Director. If the Director is delegated this responsibility they must keep the Chief Secretary informed any conflict of interest action plans for Executive Board members.

Actions for All Conflicts of Interest



When a conflict of interest exists or is perceived the following action is to be taken:

1. The SAID staff, officer, volunteer or partner informs the Director; the SAID Executive Board member informs the Chief Secretary*.
2. The individual to which the conflict of interest involves completes a “Disclosure of a Conflict of Interest form” (Appendix 13.02.04.01). In all cases the form should be completed and the Conflict of Interest disclosed to the Director of SAID.
3. The completed form is then taken to the Director or Chief Secretary * for discussion. In conjunction with the affected staff member, an action plan is to be detailed in the submitted Disclosure of a Conflict of Interest form and both the Director or Chief Secretary * and affected individual sign the form.
4. The Conflict of Interest will be noted in the SAID staff or SAID Executive Board Minutes.
5. If a volunteer, the individual is to have their tasks re-assigned to activities where there are no perceived or established conflict of interest.
6. If a project is underway, the project should be reviewed and evaluated as part of the action plan.
7. If there is a conflict of interest, in relation to SAID funded projects, both the implementing and supporting partners are to be contacted to determine the appropriate action and way forward.
8. The SAID staff or SAID Executive Board member must make a declaration at the commencement of any meeting in which the business of that meeting relates to the conflict of interest e.g. team case review, business meetings, (or on becoming aware) and noted in the minutes of the meeting.
9. The SAID staff or SAID Executive Board member to whom the conflict of interest applies will not participate in any decision-making relating to the conflict of interest.
10. Where the conflict of interest is significant and/or the person/s presence is likely to influence the decision making process, they will absent themselves entirely from the meeting while the relevant business is being discussed or decided upon.
11. The “Disclosure of a Conflict of Interest form” is to be stored in a *Disclosure of a Conflict of Interest file* maintained the SAID Director. For SAID staff members, a copy of the form is also to be retained in their personnel file.
12. For SAID staff members’, the conflict of interest action plan should be reviewed annually during the performance appraisal process with SAID Director until such time as the conflict ceases to exist.
13. For other stakeholders, the conflict of interest action plan should be reviewed as updates occur until such time as the conflict ceases to exist.



*The Chief Secretary can delegate this responsibility to the SAID Director, but then must be kept up to date by Director of any conflict of interest action plans for SAID Executive Board members.

Direct Family Members Guidance

Direct Family Members will include at the very least: Wife, Husband, Father, Mother, Son, Daughter, Brother, Sister. However, if the board member considers any other family relationship where the individual is employed by TSA and there is a potential for a conflict of interest to arise, this should be disclosed as well.