

# Conflict of Interest Policy

## 1. PURPOSE

The purpose of this policy is to ensure that actions and decisions taken at all levels of The Junction are informed, objective and fair. A conflict of interest may affect the way a person acts, decisions they make, or the way they vote in group decisions. Conflicts of interest need to be identified and action taken to ensure that personal or individual interests do not affect The Junction's services, activities, or decisions.

Declaration and management of conflicts of interest are specifically required for the members of the Board as part of the legal responsibilities.

Related documents	
Related policies and procedures, how-to task lists, forms, registers or other organisational documents of The Junction	<ul style="list-style-type: none"> <li>• JQS.P6.1 Code of Conduct</li> <li>• Conflict of Interest Register</li> <li>• JQS.F1.1 Conflict of Interest Declaration Form</li> </ul>
Other standards	<ul style="list-style-type: none"> <li>• National Mental Health Standards</li> <li>• NDIS Practice Standards</li> <li>• Human Services Quality Standards</li> </ul>
Legislation or other requirements	<ul style="list-style-type: none"> <li>• Human Rights Act 2019 (QLD)</li> </ul>

## 2. Scope

This policy applies to all Board members, employees, members, contractors, volunteers and visitors involved in the operations of The Junction.

This policy will apply to situations where the personal interests of an individual or group of individuals directly conflict with the best interests of the organisation, its members or clients, or where the decisions or actions of individuals may be influenced by their personal interests rather than those of the organisation.

This will include situations in which:

- Close personal friends or family members are involved in decisions such as employment, discipline or dismissal, service allocation or awarding of contracts
- An individual or their close friends or family members receive or may receive a financial gain or some other form of advantage
- An individual is involved with another organisation that is in a competitive relationship with The Junction Clubhouse Ltd and therefore may have access to company plans or financial information
- An individual is bound by prior agreements or allegiances to other individuals or agencies that require them to act in the interests of that person or agency, or to take a particular position on an issue that affects The Junction

## 3. Policy Statement

The Junction is committed to ensuring that personal or individual interests that conflict with the interests of the organisation are identified and managed so that they do not negatively affect the services, activities, or decisions of the organisation. The Junction will ensure the management of conflict of interest(s) in accordance with the Constitution of The Junction Clubhouse programs, by making all Board members and other parties aware of their obligations related to this policy.

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Specifically, we will:

- Maintain a register of all conflicts of interest
- Register known conflicts of interest when people first join the organisation as a Board member, employee, or visitor
- Require that people in the organisation declare any conflicts of interest as they arise
- Provide a process for people in the organisation to make a notification about undeclared conflicts of interest they believe exist, ensuring that privacy is protected for all parties involved
- Manage conflicts of interest consistently and fairly
- Maintain appropriate confidentiality about disclosed interests

### 4. Procedures

#### 4.1 Registering known conflicts of interest

A register of conflicts of interest will be maintained by The Junction Director of Operations. All potential and actual conflicts will be recorded in the register, showing:

- The name of the individual(s)
- Description of the conflict
- The date of the record
- Whether all relevant notifications have been made
- Any incidents that arise where the interest comes into conflict with the interests of the organisation, including the date of the incident and a summary of how it was managed

#### 4.2 Identifying and declaring conflicts of interest

All Board members, employees and volunteers are required to declare any potential or actual conflicts of interest they are aware of by:

- Informing those present when a conflict becomes apparent (this should always be applied where the individual will take part in decision-making processes)
- Formal notification in writing to the secretary (if the individual is the Director of Operations or a Board member) or to the Director of Operations (if the individual is an employee or volunteer) via the standard declaration form

The agenda of the Board meetings will have a standing item titled *Declaration of Conflict of Interest*, thereby requesting Board members to declare any conflicts of interest at the beginning of each Board meeting.

#### 4.3 Managing conflicts of interest

Where an apparent conflict of interest arises, we will:

- Undertake an assessment of whether a conflict exists, ensuring all processes are in place to protect the confidentiality of this information and the person declaring the conflict
- Decide on an individual's continued role in the issue (if necessary). In any case where a conflict of interest exists, the individual concerned should not take part in the discussion and, in most instances, should be ne present when the matter is discussed

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- Apply additional conditions/restrictions where the conflict relates to tendering contracts/supplies, due to a direct business interest. These conditions/restrictions are to be determined by the Board.
- Enter the agreed conditions and all relevant detail in the conflict-of-interest register.

The Junction Clubhouse Cairns Ltd (The Junction) – Conflict of Interest Policy		
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