

The Junction Club House Cairns Ltd (The Junction)		
Policy: Conflict of interest		
Policy number: JQS.P1.7		Date adopted: 22/08/2018
Authorised by: The Board		
Date last reviewed: 22/10/2020	Reviewed Quality Review Panel	Date of next review: 22/10/2022

Refer to Section 6 below for information on the process for policy review.

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"> • Code of Conduct • Conflict of Interest Register • Conflict of Interest Declaration Form
Other standards	<ul style="list-style-type: none"> • National Mental Health Standards • Human Services Quality Standards • NDIS Practice Standards
Legislation or other requirements	<ul style="list-style-type: none"> • Human Rights Act 2019 (QLD)

1. Purpose:

The purpose of this policy is to ensure that actions and decisions taken at all levels at 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 their legal responsibilities.

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 may make a financial gain or gain some other form of advantage
- an individual is involved with another organisation that is in a competitive relationship with our organisation and therefore may have access to our 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.

3. Policy statement: Our commitment

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 affect the services, activities or decisions of the organisation. We will ensure that we manage any conflict of interest in accordance with the constitution of The Junction Clubhouse programs by making all Board members and other parties aware of their obligations and this policy.

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 volunteer
- 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 Director of The Junction. All potential and actual conflicts will be recorded in the register, showing:

- the name of the individual
- the description of the conflict
- the date of record
- whether all relevant notifications have been made
- any incidents that arise where the interest comes into conflict with the interests of the organisation, 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 is about to take part in a decision-making process)
- formal notification in writing to the secretary (for board members and the the Director) or the Director (for employees or volunteers) via the standard declaration form.

The agenda of the board meetings will have a standing item titled *Declaration of Conflict Interest*, thereby requesting board members to declare any conflict 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 interest
- Decide about the individual's continued role in the issue, if any. In any case where a conflict of interest exists, the individual concerned should not take part in the decision and, in most instances, should not be present when the matter is discussed
- Apply additional conditions/restrictions where the conflict relates to tendering for certain contracts/supply due to a direct business interest. These restrictions/conditions are to be determined by the Board
- Enter the agreed conditions in the conflict of interest register.

5. Review processes

Policy review frequency: Annually	Responsibility for review: The Director
Review process: The Director as Chair of the Quality Review Panel convenes the panel to conduct reviews.	
Documentation and communication: All policy decisions will be documented and communicated through the Quality Review Panel observing the Document Control HTTL. Note: add version number after review.	