

Conflicts of Interest Policy

Policy Statement

Activ commits to ensuring that actual or perceived conflicts of interest are managed to mitigate risk to individuals, customers and the broader organisation.

The Conflicts of Interest Policy supports Activ’s Code of Conduct & Ethics Policy and applies to everyone – staff, employees, volunteers, work experience placements, managers, Directors of Activ and contractors – and sets a clear standard of what is expected of individuals in their Activ-related activities.

It is expected that individuals are not involved in, and do not become involved in any conduct or activity that may compromise their ability, or the perception of their ability to perform their role in the best interest of Activ.

A conflict of interest exists when relationships, actions or interests outside of Activ interfere, might interfere, or even appear to interfere, with an individual’s duties or Activ’s business interests.

This policy explains everyone’s responsibilities in declaring and managing conflicts of interest before and during the course of their employment/engagement.

Policy

Everyone who works with, or for Activ	is responsible for: <ul style="list-style-type: none"> • declaring any potential, actual or perceived conflicts of interest, including those that arise during the course of their employment/ engagement; and • complying with any instruction to minimise the risk associated with an actual or potential conflict of interest.
Governance and Risk Team	is responsible for: <ul style="list-style-type: none"> • maintaining a register of all declared conflicts of interest (Board COI separate register); • providing support, to identify recommendations to mitigate the risk associated with conflicts of interest; and • escalating concerns about a potential or actual conflict of interest to the Executive or CEO.
People Leaders	are responsible for: <ul style="list-style-type: none"> • ensuring that staff are aware of, and follow all actions required to manage conflicts of interest; • discussing concerns about a potential or actual conflict of interest; and • ensuring that any conflicts of interest that they become aware of are reported, together with recommendations to mitigate the risk associated with the conflict of interest, to the Governance and Risk Team for approval.
Executives	are responsible for: <ul style="list-style-type: none"> • recording the details of any declared conflicts of interest in meeting minutes and on the Conflicts of Interest Register.
Directors	are responsible for: <ul style="list-style-type: none"> • declaring any potential, actual or perceived conflicts of interest including those that arise during the course of their Board engagement; • complying with any instruction to minimise the risk associated with an actual, potential conflict of interest; and • raising to the notice of the Board, any actual or potential conflicts of interest they are aware of, of another Board member.
Board Chair	is responsible for: <ul style="list-style-type: none"> • taking all necessary steps to ensure that all disclosed Board conflicts of interest are appropriately managed to mitigate risk; and • ensuring that details of any declared conflicts of interest are recorded in Board meeting minutes and on the Board Conflicts of Interest Register.

Policy Context

Relevant standards:

- National Standards for Disability Services
- NDIS Quality and Safeguarding Framework

Legislation:

- *NDIS Act 2013*
- *Association's Incorporation Act 2015 (WA)*
- *ACNC Act 2012*

Related policies and procedures:

- Code of Conduct and Ethics Policy (1867)

Relevant work instructions, forms, other documents:

- Declaration of Conflicts of Interest Form (3272)