



MARY WARD INTERNATIONAL AUSTRALIA

CONFLICT OF INTEREST POLICY

1. Introduction

Mary Ward International Australia (MWIA) is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflicts of interest that might arise in the course of its operations.

2. Purpose

The purpose of this policy is:

- To protect the integrity of MWIA and manage risks arising from conflicts of interest;
- to ensure transparency and objectivity in the activities, projects and structures of MWIA;
- to ensure that MWIA's reputation is not compromised by poorly managed conflicts of interest;
- to provide a framework for those who represent MWIA to identify, disclose and manage any actual, potential or perceived conflicts of interest.

3. Scope

This policy applies to MWIA Company members, Board directors, Committee members, employees, volunteers, partners and other stakeholders who operate under the auspices of MWIA.

4. Definition

A conflict of interest arises when a person participating in decision-making, related to the operation of MWIA, gains or is perceived to gain advantage (or avoid a disadvantage) for themselves or for another person, or organisations in which they have an interest.

Conflicts of interest can occur when personal interests have the potential to interfere with a stakeholder's responsibility to act in the best interests of MWIA. Personal interests include direct interests, as well as those of family, friends or organisations a person may be involved with or have an interest in (for example, as a director or employee). It may be actual, potential or perceived and may be financial or non-financial.

5. Policy statement

Conflicts of interest do not need to present a problem if they are openly and effectively managed. MWIA will manage conflicts of interest by requiring its stakeholders to:

1. Take all reasonable steps to avoid situations where their private financial, legal, ethical or other interests (or those of immediate family members) could be perceived to conflict with their responsibilities in relation to MWIA.
2. Identify and declare any real or perceived conflicts of interest; any affiliation that they have with an actual or potential supplier of goods and services during a procurement or tender process; or connection with a recipient of grant funds or organisation with competing or conflicting objectives.
3. Disclose any material gifts or offers of gifts for their personal use, and refrain from accepting valuable or otherwise inappropriate gifts.
4. Absent themselves from discussion and abstain from voting or otherwise participating in decision-making on any issues in which they might have a conflict of interest.
5. Familiarise themselves with ACNC governance standards, in particular governance standard 5, which requires board directors of registered charities to be aware of and observe a set of duties – one of which is to disclose perceived or actual conflicts of interest.
6. Maintain confidentiality in relation to these matters at all times.

6. Responsibilities

Everyone in MWIA is responsible for identifying, disclosing and resolving conflicts of interest. Specifically:

- MWIA Board and Committee members must ensure that conflicts are disclosed, managed and resolved, and monitor compliance with this policy.
- MWIA’s Company Secretary must receive conflict of interest notifications from Directors and Committee Members, review the effectiveness of management strategies, and register in the relevant Director and Committee members Register of Interests.
- The Executive Officer must provide leadership in implementing, communicating, reviewing, facilitating compliance and taking appropriate action for breaches of this policy.
- Staff must disclose conflicts of interest to the Executive Officer and advise if they see an actual or potential conflict of interest that may not be appropriately managed.

Responsible Person	Date Created	Scheduled Review date
MWIA Board	2012	August 2023
Contact	Version	Status
Hannah George (Executive Officer)	4.1	Final
Authorisation name	Authorisation signature	Date of authorisation
Dr Leoni Degenhardt AM (Chair)		7 October 2021

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CONFLICT OF INTEREST PROCEDURES



Process

1. Before Company members, Board directors, Committee members, employees, volunteers, partners and other stakeholders begin their service with MWIA they need to submit a completed Conflict of Interest Acknowledgment and Disclosure Form to the Executive Officer. This includes any involvement with other charitable and business organisations, vendors or business interests, or with any other associations that might produce a conflict of interest.
2. Disclosure of interest shall be a standing agenda item at all MWIA Board and Committee meetings.
3. Once an actual, potential or perceived conflict of interest has been identified, it must be entered into MWIA's register of interests, which is maintained by the Company Secretary and Executive Officer.
4. It is the responsibility of the Company Secretary and Executive Officer to maintain the register of interests and to record information related to a conflict of interest, including the nature and extent of the conflict of interest and any steps taken to address it.
5. Where a conflict of interest is shared about a Board or Committee member, reference should be made to ACNC governance standard 5 to ensure that proper disclosure occurs.
6. Once a conflict of interest has been identified, in deciding what approach to take, consideration needs to be given to whether:
 - there is a possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of MWIA;
 - the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making;
 - the conflict needs to be avoided or simply documented;
 - there are alternative options to avoid the conflict.
7. Furthermore, in determining how to handle a conflict of interest, it must be decided whether the person(s) concerned should vote on the particular matter; participate in the discussion; or engage in any way with the issue under consideration. A conflict of interest may be managed and resolved by one of the following strategies:

- Removing the stakeholder from participating in the matter
 - Restricting the stakeholder on their involvement in the matter
 - Recruiting a third party to provide advice (such as a probity adviser, lawyer or governance expert)
 - Relinquishing the private interest.
8. If a person alleges that a Board or Committee member has a conflict of interest, whether existing or potential, and that person does not agree, and if the Board cannot resolve this allegation to the satisfaction of both parties, the matter shall be reviewed by a select panel of the MWIA Board, who may or may not engage an independent person to assist. The select panel will be determined by the Chair or Deputy Chair when the Chair has the alleged conflict of interest. This panel will make a recommendation to the Board as to what action can be taken.

The approval of any action requires the agreement of at least a majority of the Board or Committee members (excluding any conflicted 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 interests.

9. On an annual basis all MWIA Company members, Board directors and Committee members shall be provided with a copy of this policy and required to complete and sign the Conflict of Interest Acknowledgement and Disclosure Form.

Related documents

- MWIA Conflict of Interest Acknowledgement and Disclosure Form
- MWIA Privacy Policy
- Loreto Code of Conduct
- Loreto Whistleblower Policy
- Financial Wrongdoing Policy



CONFLICT OF INTEREST ACKNOWLEDGEMENT & DISCLOSURE FORM

I have read the Mary Ward International Australia (MWIA) Conflict of Interest Policy and agree to comply fully with its terms and conditions at all times, while operating under the auspices of MWIA. If at any time following the submission of this form, I become aware of any actual or potential conflicts of interest, or if the information provided below becomes inaccurate or incomplete, I will promptly notify the MWIA Board Chair or MWIA Executive Officer in writing.

DISCLOSURE OF ACTUAL OR POTENTIAL CONFLICTS OF INTEREST

I give standing notice that I have an interest in the following matters that may relate to MWIA. I also set out below details of the nature and extent of my interest.

Signature: _____

Printed Name: _____

Date: _____