

TITLE	Conflict of Interest Policy
TARGET AUDIENCE	Cabrini Outreach employees and volunteers
SCOPE	Cabrini Outreach Services and Programs

PURPOSE

We are committed to fair, transparent and well-informed decision making that is not influenced by conflicts of interest. The purpose of this document is to advise employees and volunteers on matters relating to potential, actual or perceived “interest” and the procedure to follow in response to these situations. The policy and procedure aim to ensure that employees and volunteers carry out their duties and responsibilities with impartiality and integrity and mitigate risk for all parties concerned.

DEFINITIONS

Interest	Means “advantage or benefit”: to “have an interest” means to stand to benefit in some way from a particular decision or transaction.
Common interest	A situation where an individual involved in decisions, actions or outcomes as part of their job has personal interest in the outcome as well as interests as an employee of Cabrini Health, and these two sets of interest are in agreement.
Conflict of interest	A situation where an employee or volunteer involved in decisions, actions or outcomes as part of their job has a private and/or personal interest sufficient to appear to influence the objective exercise of his or her official duties.
Real or actual conflict of interest	A situation where the private or personal interest is in place during the exercise of the official duties, whether or not these duties have been carried out improperly.
Potential or foreseeable conflict of interest	A situation that may develop into an actual conflict of interest if the individual were to have particular official responsibilities in the future.
Apparent or perceived conflict of interest	A situation where a third party could form the view that the individual’s judgment is likely to be compromised.
Private interest	The term ‘private interest(s)’ includes not only an employee or volunteer’s own personal, professional or business interests, but also the personal, professional or business interests of individuals or groups with whom they are closely associated.
Pecuniary Interests	Interests that involve an actual, potential or perceived financial gain or loss. Money does not need to change hands for an interest to be pecuniary. People have a pecuniary interest if they (or a relative, or a close associate) own property, hold shares, have a

position in a company bidding for government work, or receive benefits such as concessions, discounts, gifts or hospitality from a particular source.

Non-pecuniary interests Interest that do not have a financial component. They may arise from personal or family relationships, or involvement in sporting, social or cultural activities. They include any tendency toward favour or prejudice resulting from friendship, animosity, or other personal involvement with another person or group.

POLICY

All employees involved in decisions covered by the Cabrini Health Delegation of Authority Policy (refer Delegation Roles) must disclose any and all interests, whether common or conflicting and whether actual, potential or perceived and/or relationships with clients, other employees or other organisations with which Cabrini does significant work.

All employees involved in the selection of suppliers or contractors must declare if they have a Common Interest, potential, perceived or real, with that supplier/contractor or potential supplier/contractor to Cabrini.

Employees and volunteers are not permitted to use any of Cabrini's resources for income generation for themselves.

If two people, one of whom has some form of control or responsibility over the other, are involved in a relationship of a personal, professional or familial nature, they have a duty to disclose this to the General Manager Cabrini Outreach, as there may be an actual or perceived conflict of interest.

Employees and volunteers are required to disclose any interest they have in any business, company, or other organisation and the holding of any office that may adversely affect his/her ability to properly carry out their duties and responsibilities.

A breach of this policy may result in disciplinary action including dismissal of employment or termination of volunteer engagement. In addition, disciplinary measures will apply to any manager who directs, approves of such actions, or has knowledge of them and does not respond promptly to correct them.

PROCEDURE

1. All Cabrini Outreach employees and volunteers are required to sign the Cabrini Outreach Code of Conduct as part of the employment/engagement process.

The Code of Conduct includes commitments not to take advantage of his/her position for personal gain, and to use Cabrini Outreach resources (including premises, goods, money, reputation, image etc) with respect and care and in the interests of the organisation and the populations it seeks to serve.

The signed Code of Conduct is retained by the General Manager Cabrini Outreach and a copy is provided to the employee/volunteer.

2. All employees involved in decisions covered by the Cabrini Health Delegation of Authority Policy must complete a Declaration of Interests Form when appointed to a position nominated in the DOA Delegation Roles and thereafter at their annual performance review or when their personal situation changes.

A Register of Private Interests will be maintained by the Financial Controller.

3. All employees involved in the selection of suppliers or contractors must complete a Procurement Interest Declaration Form before providing advice or being involved with (including approving or recommending) any procurement related matter.

Procurement Interest Declaration Forms relating to the procurement function are managed by the Procurement Manager and filed with the respective contract.

4. Where a common interest or a conflict of interest arises or is identified during an employee's employment or volunteer's engagement, a Conflict of Interest Declaration Form must be completed and submitted to the Group Director Mission and Cabrini Outreach.

If the conflict of interest arises for the employee as a member of a Committee, the form is to be submitted to the Chair of that committee or the Executive Sponsor of the committee if necessary. The Executive Sponsor or Committee Chair will discuss the conflict of interest with the employee and agree and document an appropriate Conflict of Interest Action or Management Plan.

The Conflict of Interest Declaration Form is to be completed and signed by both parties. Both parties are to retain a copy of the signed and completed declaration form and a scanned copy is to be recorded in the Electronic Conflict of Interest Register which is managed by Financial Controller.

If the declaration relates to a Committee process a copy will be retained with the minutes and noted in the minutes.

EVALUATION

This document will be reviewed annually for content and changes to processes.

REFERENCES and ASSOCIATED DOCUMENTS

Policies and Procedures

Cabrini Health Declaration of Interest Policy and Procedure

Conflict of Interest Declaration Form

Procurement Interest Declaration Form

Cabrini Outreach Code of Conduct

Executive Sponsor	Group Director Mission and Cabrini Outreach	
Content Approved By:	General Manager Cabrini Outreach	Date: 10 April 2019
Authorised to Publish By:	Group Director Mission and Cabrini Outreach	Date: 10 April 2019