THE GLIDING FEDERATION OF AUSTRALIA INC

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Conflict of Interest and Commitment Policy

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TABLE OF CONTENTS

1 Purpose 4
2 Scope 4
3 Policy statement 4
3.1 Types of Conflicts of Interest 4
3.2 Responsibilities of the Organisation 5
3.3 Responsibilities of the Board and Managers 5
3.4 Responsibilities of Employees and Contractors working for Gliding Australia 6
4 Procedure 6

1 Purpose

To outline the Gliding Australia's policy on conflicts of interest within the organisation and to clarify the Board and staff obligations in relation to personal or business interest and other relationships that may affect business arrangements involving Gliding Australia, so as to avoid actual or perceived conflicts of interest.

2 Scope

This Policy applies to all members of Gliding Australia, employees and Board members and affiliated organisations.

In particular, this policy applies to:

- The President, Vice President, Treasurer and Secretary,
- All Board members,
- All employees
- All members who receive money on a permanent or contract basis
- The Executive Officer and any paid Gliding Australia manager, or any employee or volunteer occupying a decision-making position or with influence over decision-making involving business arrangements.

For the purposes of the rest of this document, all of the above relevant positions will be referred to as "Relevant Persons"

3 Policy statement

Conflict of interest risks are an inevitable fact of organisational life and can arise without anyone being at fault. Problems can arise where these risks are not properly managed.

The management of risk associated with any actual, potential or perceived conflict of interest situation is fundamental to ensuring the highest levels of integrity and trust are achieved and maintained.

3.1 Types of Conflicts of Interest

Conflicts of interest are conflicts between Gliding Australia organisational duties and private interests. These can be actual, potential or perceived.

- An actual conflict of interest is one where there is a real conflict between a Gliding Australia Relevant Person's duties and responsibilities, and their private interests.
- A potential conflict of interest arises where Relevant Person has private or gliding interests that could conflict with their Gliding Australia duties or could be contrary to the best interests of Gliding Australia.
- A perceived conflict of interest can exist where a third party could form the view that a Relevant Person's private interest could improperly influence the performance of their duties, now or in the future, or influence the decisions of others in the matter.
- A conflict of interest can arise from a person avoiding personal losses, as well as gaining personal advantage whether financial or otherwise.
- Conflict of interest arises with situations in which the personal interest of an individual or organization might adversely affect a duty owed to make decisions for the benefit of a third party.

This policy exists to ensure Relevant Persons are not distracted from the performance of their duties and commitment to Gliding Australia interests due to an involvement in an external commercial interest, other activity, or personal relationship. The emphasis of this policy is on Relevant Persons who receive money for services to the sport declaring their external interests and arriving at a workable solution with Gliding Australia, rather than prohibiting external interests without due consideration to the individual.

Employees and contractors are remunerated on the assumption that all their working time and energies will be devoted to Gliding Australia interests. Employees, in accordance with the provisions of their employment

contract, are not to engage in any work that could be considered to be in direct competition with Gliding Australia.

All conflicts of interest whether direct or indirect, actual or potential, pecuniary or non-pecuniary are captured by this policy.

This policy gives a proactive mechanism for handling such situations.

This policy complies with the Victorian Incorporated Associations Reform Act 2012.

3.2 Responsibilities of the Organisation

Gliding Australia's best interests are paramount to members, directors, employees or associates.

Gliding Australia has the responsibility to comply with the legislation and intent of the Victorian Incorporated Associations Reform Act 2012 and any relevant commonwealth legislation.

Gliding Australia is responsible to promote and project the image and reputation with members, employees and the general public that Gliding Australia operates under ethical standards and sound business practices.

Gliding Australia aims to avoid any dissent and unrest in decision-making through publication of a transparent process to handle and record conflict of interest.

Ensuring that Gliding Australia's interests are not compromised should be the overriding objective of any conflict of interest management strategy. Gliding Australia is responsible for:

- establishing a system for identifying and managing conflicts of interest in the form of detailed policies and procedures;
- building an organisational culture that supports implementation of all relevant policies through appropriate education, training and enforcement activities;
- reviewing relevant policies and procedures on a regular basis to ensure they are effective;
- receiving and investigating complaints regarding possible breaches of conflict of interest policies;
- monitoring compliance with conflict of interest policies, including responses to alleged breaches.

3.3 Responsibilities of the Board and Managers

The Board, employees and members of Gliding Australia:

- shall not have a personal interest or engagement with a third party except with the fully informed consent of Gliding Australia.
- shall not misuse their position or knowledge within Gliding Australia for personal or professional gain, profit or advantage except with the fully informed consent of Gliding Australia.
- shall not misappropriate Gliding Australia's property, intellectual property or knowledge for their own or a third party's advantage or usage except with the fully informed consent of Gliding Australia.
- shall give notice of any material personal interest or involvement relating to any affairs of Gliding Australia.
- The Gliding Australia Board and Managers influence or participate in decisions, and are responsible for complying with conflict of interest policies with respect to their own conflicts and potential conflicts of interest facilitating the compliance of those they supervise by:
    - being aware of the risks of conflicts inherent in the work of the staff or members they manage;
    - making staff and contractors aware of relevant policies and procedures;
    - advising staff and contractors about appropriate ways to manage conflicts;
    - recording the receipt of disclosures of conflicts of interest reported to them by staff and contractors;

- assisting with preparation of management strategies for staff and managers who disclose conflicts of interest;
- monitoring the work of staff and managers and the risks to which they are exposed.

3.4 Responsibilities of Employees and Contractors working for Gliding Australia

Employees and contractors are responsible for:

- being aware of their obligation to avoid conflicts of interest where possible, and manage those conflicts of interest that cannot be avoided;
- assessing their private and personal interests, and whether they conflict, or have the potential to conflict, with their official duties;
- disclosing conflicts of interest they may have in accordance with specified procedures; and
- complying with the requirements of this general policy or related specific policies and procedures.

Gliding Australia has no desire to limit the involvement of employees in outside interests. However, it is entitled to ensure that outside interests do not lead to a conflict of interest with Gliding Australia or make demands upon their time and energy to the extent that it adversely affects their job performance.

4 Procedure

Any personal or business matter which is/or could lead to a conflict of interest must be declared at the earliest possible time to the President (or if appropriate, Vice President) and the Executive Officer (for managers and employees) who will advise the President as soon as practicable.

Individual Board Members, the Executive Officer, other Managers or employees who are aware of a real or potential conflict of interest pertaining to another Board Member, the Executive Officer or other Managers or an employee, have a responsibility to advise the President (in the case of Board Members and the Executive Officer) or the Executive Officer (in the case of managers or employees) who will advise the President if the interest is considered potentially material.

For employees, the Executive Officer will decide if there is an actual conflict of interest and if it is of a material nature will inform the President. All conflicts of interest involving the Executive Officer will be referred to the President for a determination about materiality. The President shall fully document the reasoning behind all such determinations and make the documentation available for review by the Board.

All material declarations are to be recorded in a “Register of Interests” held by the Secretary.

For Board Executive, the full Board will decide if there is an actual conflict of interest and if it is of a material nature which will be minuted along with the necessary action to be taken.

A Board Member with a declared and material conflict of interest shall not vote on any resolution concerning the issue and may only remain in the room during any discussion with Board approval which shall be minuted. As part of the minute process, the Board will determine whether the discussion, outcome or resolution is to be shared with the Board Member with a material conflict of interest.

The President is ultimately responsible for managing conflict of process issues in accordance with this policy. Where the President is absent or directly involved then responsibility falls to a Vice President.