

# Conflict of Interest Policy



## 1. Scope

Sight For All Board Directors, Visionaries and staff have a responsibility to operate in the best interests of the organisation. Situations and actions that may be, or create the appearance of being, in conflict with the organisation's overall interest, objectives, principles and Code of Conduct, are to be avoided.

The Australian Government's Department of Foreign Affairs and Trade Conduct and Ethics Manual defines a conflict of interest as "A conflict of interest arises where a public official has private interests which may or do improperly influence the performance of their official duties or responsibilities." (<https://dfat.gov.au/about-us/publications/corporate/conduct-ethics-manual/Pages/chapter-5-conflicts-of-interests.aspx#section-5-1>)

Conflicts of interest are either real or apparent.

This policy applies to Sight For All Board Directors, staff, volunteers and Visionaries.

## 2. Requirements of Sight For All

Sight For All Board Directors, staff, volunteers and Visionaries are required to:

- Behave with integrity and honesty in their dealings with and on behalf of Sight For All
- Take reasonable steps to avoid any real or apparent conflict of interest
- Disclose any real or apparent conflicts of interest as soon as possible.

## 3. Potential causes of conflict

Activities that have the potential to cause a conflict of interest include, but are not limited to:

- holding a substantial financial interest in any organisation (e.g. suppliers, customers) that has dealings with Sight For All
- the acceptance by a staff member from any party or supplier of goods and/or services, either directly or indirectly, of cash payments, goods, services, loans (except from banks or other financial institutions), or discounts that are not generally available to all staff members
- the acceptance by a staff member, either directly or indirectly, of any gifts, gratuities or services in kind from any party that is involved, or is attempting to be involved with Sight For All
- the ownership by a staff member, Board Director or a member of staff member or Board Director's family, in any proportion, of land and/or other assets, either directly or indirectly, that is the subject, or potential subject, of business dealings with Sight For All
- engaging in nepotism, by the offer of employment to a member of a staff member or Board Director's family, especially where the family members would be involved in a direct reporting relationship
- a personal relationship with another staff member or Board Director, including familial, sexual or financial, where there is a potential for, or a perception that, a conflict of interest could exist where there is a possibility that a decision may be biased in favour of or against, a person with whom there is a personal relationship
- engaging in outside employment (including self-employment or carrying on a business) where such employment will, or has the potential to:
  - impact on the staff member's ability to perform their normal functions;

- create a conflict of interest; and/or
- compromise the confidentiality of the organisation;

Problems arising out of these situations can usually be avoided by Board Directors and staff members conducting any business on behalf of Sight For All in an ethical, honest and transparent manner.

#### 4. Declaration of a Conflict of Interest

Sight For All Board Directors are provided with an opportunity to declare a conflict of interest at all Sight For All Board Meetings. Declarations are recorded on the Conflict of Interest Register maintained by the Executive Officer. Where there is no conflict of interest to declare, this is also recorded on the register.

Sight For All staff, volunteers and Visionaries are also required to assess whether they have a conflict of interest, considering whether their personal interests could be influenced by decisions they have made or actions they have taken. Any real or potential conflicts of interest should be disclosed as soon as they arise.

An example of real or potential interests to be disclosed are only those that could be, or could be seen to affect Board Directors, staff, volunteers and Visionary's official responsibilities with Sight For All. This may include company partnerships, trusts or nominee companies and private business.

Sight For All has a Conflict of Interest Declaration Form to be used when declaring a conflict of interest.

#### 5. Related Documents

- Sight For All Code of Conduct Policy
- Sight For All Conflict of Interest Declaration Form
- Sight For All Conflict of Interest Register
- Sight For All Transparency Policy

#### 6. Review

The Sight For All Conflict of Interest Policy is reviewed on a biennial basis.

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