

Conflict of Interest Policy



1. Introduction

GWM is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflicts of interest. It is not always possible to avoid actual or perceived conflict of interest. Equally, a conflict itself is not necessarily wrong or unethical. However, it is important that conflicts of interest are identified, disclosed and managed in a transparent and accountable manner.

2. Definition

Conflict of Interest:	A conflict of interest occurs where an individual's ability to exercise judgement or act in one role is or could be impaired or otherwise influenced by his or her involvement in another role or relationship. The individual does not need to exploit his or her position or obtain an actual benefit, financial or otherwise. A potential for competing interests and/or a perception of impaired judgement or undue influence can also be a conflict of interest
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3. Scope

This policy has been developed to provide a framework for all Board of Directors (BD) Members and GWM personnel (staff and volunteers) in declaring conflicts of interest.

4. Procedure

GWM personal and office bearers shall declare any conflicts of interest and potential conflicts of interest, at commencement/appointment with GWM, as they arise, and as requested.

4.1 Personnel

Personnel should inform the CEO.

In some cases, it will be sufficient to document and acknowledge the conflict.

In other cases, the staff member/ volunteer may be removed from involvement in a particular decision or activity.

All strategies to manage conflicts will be documented and reviewed.

4.2 Board members

Board members should disclose conflicts of interest and potential conflicts of interest at either at the start of the BD meeting concerned or when a relevant issue arises. The nature of this conflict of interest should be entered into the meeting minutes.

Where a conflict of interest or potential conflict of interest is identified and/or registered, the BD member concerned shall leave the room as soon as that item comes up for discussion. The concerned BD member shall not vote on that issue, nor initiate or take part in any BD discussion on that topic (either in the meeting or with other BD members before or after the BD meetings), unless expressly invited to do so by unanimous agreement by all other members present.

If a person declares themselves to have an existing or potential conflict of interest, confidentiality will be respected.

Board members will document conflicts of interest in the BD Conflicts of Interest Register.

A BD member who believes another BD member has an undeclared conflict of interest should specify in writing the basis of this potential conflict.

Examples of possible conflict of interest by BD:

- When a BD member or his/her immediate family or business interests stands to gain financially from any business dealings, programs or services of the organisation.
- When a BD member him or herself offers a professional service to the organisation.
- When a BD member stands to gain personally or professionally from any insider knowledge if that knowledge is used to personal advantage.
- Where a BD member or the ex/officio member of the BD has a role on the governing body of another organisation, where the activities of that other body may be in direct conflict or competition with the activities of GWM.

5. Related documents

- Conflict of Interest Register – Board of Directors.

6. Review

This policy will be reviewed every 5 years.