

Conflict of Interest Policy

Policy Owner:	The CEO is responsible for the review and currency of this policy.
Endorsement:	Endorsed by the Executive Leadership Team on 25/06/2026
Board Approval:	Adopted by the Board of Directors at a meeting of the Board on 30/06/2026 This policy is valid from the date of Board approval and remains in force, as amended from time to time, until such time as formally revoked by resolution at a meeting of the Board of Directors.
Next Review Due:	July 2029

1. Purpose

Mallee Accommodation and Support Program Limited (“**MASP**”) values openness and promotes transparency in its processes, procedures, and decision-making. We emphasise consistency, fairness, and integrity in all relationships with our stakeholders.

Directors and staff are expected to avoid ethical, legal, financial, and personal conflicts of interest and ensure their private interests do not conflict with their duties to MASP.

This Policy provides guidance on identifying, disclosing and managing actual, perceived and potential conflicts of interest.

To the extent that the contents of the Policy refer to obligations on MASP, they are guidelines for management or summaries of applicable legislative requirements only and are not contractual terms, conditions or representations on which a staff member may rely.

2. Scope

This Policy applies to all board directors, employees, agents, and contractors (including temporary contractors) ('workers') of MASP

Board Directors may be excluded from some sections of this Policy as indicated within the section.

3. Policy Statement

3.1 What is a Conflict of Interest?

A conflict of interest arises when a worker has a private or secondary interest that could improperly influence (or be seen to influence) the worker's duties, responsibilities or decision making at MASP.

Conflicts can also arise where a worker seeks to use their position (or be seen to use their position) to gain advantage or seek to gain advantage for themselves or others or to cause detriment to MASP. It can also include avoiding personal disadvantage.

Conflicts of interest may be:

- **Actual** – an individual can be influenced by their private interests when performing their job.
- **Perceived** – an individual can appear to be influenced by their private interests when performing their job.
- **Potential** – an individual may be influenced by their private interests when performing their job in the future.

A private interest includes not only a worker's own personal, material, professional or business interests, but also the personal, professional or business interests of individuals or groups they are or may be associated with. This includes relatives, friends or even rivals.

Workers are to refrain from letting personal and/or financial interests and external activities come into opposition with MASP's fundamental interests. This Policy also prohibits workers from using their position, information acquired in their position, or MASP's assets to obtain a benefit or advantage for themselves, or for any other person.

There are several personal interests which should be considered in ascertaining whether a conflict of arise (actual, potential or perceived) may have arisen as set out below.

3.1.1 Material Interests

Material interests are personal advantages or financial gain a worker might receive, such as job offers, hospitality, gifts, increase in land value, money and direct profit.

They can include:

- Directorships,
- family businesses,
- shareholdings,
- real estate,
- debts,
- assets, or
- trusts that might conflict with a worker's job responsibilities.

3.1.2 Personal Relationships

A worker may have family or other personal relationships with people engaged in activities that could have an interest in issues the worker is dealing with. Examples could include people who supply goods and services to MASP, clients of MASP, or volunteers of MASP.

Where these relationships exist it is important for workers to be open about them and disclose any family or other personal relationships that could or could be seen to impact on their work responsibilities and the reputation of MASP.

3.1.3 Secondary Employment and Affiliations

The following may give rise to conflicts of interest:

- secondary employment commitments,
- future employment prospects or plans,
- affiliations with for-profit and non-profit organisations, sporting bodies, clubs, associations, political, trade union or professional organisations, and
- other personal interests.

Unpaid or voluntary outside work can present the same potential for conflict of interest as paid outside employment, and should both be treated with the same level of importance.

Even if a worker obtains approval to engage in outside work, the arrangement should be declared if it could or could be seen to impact on the individual's work responsibilities with MASP. There is more information about MASP's requirements for secondary employment commitments in the [Secondary Employment Policy](#).

3.2 Responsibilities for Disclosing and Managing Conflicts of Interest

Managing conflicts of interest is the shared responsibility of MASP, senior management, supervisors, human resources and workers.

All workers have a responsibility to ask themselves whether their actions or decisions could give rise to a real, perceived or potential conflict of interest, and if so, to take action to manage that conflict.

A worker is responsible for:

- being aware of their obligation to avoid conflicts of interest wherever possible
- assessing whether their private interests conflict or potentially conflict with their job responsibilities
- formally disclosing any conflict of interest (actual or perceived)

- managing any conflicts that can be effectively managed, and
- otherwise complying with this Policy.

Managers are responsible for:

- complying with this Policy in respect of their own conflicts of interest, and
- facilitating compliance with this Policy by assisting members of their team to comply with this Policy by:
 - promoting, educating and ensuring compliance with this Policy
 - ensuring staff in their teams make appropriate declarations
 - discussing and documenting strategies that might be implemented to effectively manage disclosed conflicts, and
 - monitoring the work of their team for any potential conflicts of interest their staff might be exposed to.

3.3 Declaring a Conflict of Interest

Section 3.3 does not apply to Board Directors. Board Directors are required to declare their conflicts in accordance with the Board of Directors Code of Ethics and Proper Conduct Policy.

3.3.1 When to Declare an Interest

Avoiding all conflicts of interests (real, perceived or potential) is not always feasible. However, in all cases where a conflict of interest arises, the conflict should be openly and transparently declared as soon as possible.

If a worker identifies an actual or perceived conflict of interest, they should declare it and discuss how the conflict might be managed with their manager. For this purpose you can use *Attachment 1 - Declaration of Conflict of Interest and Management Plan* or the electronic version of this form found at MASP Connect.

3.3.2 What Happens After a Declaration is Made

It is not enough to simply make a declaration of interests. If the declaration discloses a conflict (actual or perceived), discussions must occur with the worker's manager and arrangements should be developed to address this conflict. These arrangements should be recorded in a management plan.

3.3.3 What is a Management Plan

In order to develop a management plan to manage a conflict of interest, a worker should use *Appendix 1 - Guide to Rating Conflicts of Interest* to assess the severity of the conflict and

Appendix 2 – Strategies to Manage Conflicts of Interest to identify what strategies might be appropriate to manage the conflict.

The worker should discuss the conflict and their proposed strategy to manage the conflict with their manager and develop a management plan. A template management plan is provided at *Attachment 1*. The electronic version of this form may be found at MASP Connect.

Management plans addressing low and medium level conflicts require the approval of the ELG member that the program area manager reports to. In approving the management plan the ELG member may consult with members of the SLG, ELG or CEO.

Management plans addressing high level conflicts require the approval of the CEO. The CEO will brief the board on all high level conflicts.

Declarations and management plans are to be completed through the approved form and medium. If the forms are required to be emailed these can be sent to ceo@masp.org.au

3.3.4 What to do if Something Changes

A declaration only remains relevant if it is regularly monitored and updated. Workers must notify their manager if something that might impact on the decisions they make or the advice they provide changes. This includes changes to:

- an individual's responsibilities
- the subjects the individual makes decisions or give advice about, or
- an individual's personal circumstances.

After notifying the relevant manager of a change, a worker will both need to reassess the conflict of interest and update their management plan where applicable.

3.3.5 How Declarations and Management Plans are Handled

Declarations and management plans are stored on a centralised register, and a copy is placed on the personnel file. These documents are securely retained and only accessed by authorised persons. MASP is responsible for ensuring declarations and management plans remain confidential.

MASP's Privacy Policy details how your personal information is held by MASP. The Privacy Policy also explains how you can make a complaint about a breach of the Australian Privacy Principles and how the MASP handles such complaints.

3.3.6 Addressing conflicts of interest

When an actual conflict of interest is found, any transactions or matters that may have been affected will be reviewed retroactively. Affected parties both within and outside of the business may be notified, if relevant to do so.

If the conflict in question involves a member of management, they will be excused from the deliberations.

The responsibility of resolving a conflict of interest starts from the immediate manager and may reach senior management. Senior management has the responsibility of the final decision when a solution cannot be found.

3.4 Mandatory Conflict Declarations for Recruitment and Procurement

3.4.1 Recruitment and Selection Panels

Any worker participating on an interview or selection panel is required to identify and manage conflicts of interest in accordance with this Policy. Prior to taking part in any stage of a recruitment or selection process, panel members must review the list of candidates and assess whether any actual, potential, or perceived conflict of interest exists, including personal, family, professional, or financial relationships.

Where a conflict is identified, the panel member must formally declare the conflict by completing *Attachment 1 - Declaration of Conflict of Interest and Management Plan*. Declared conflicts will be assessed and managed to ensure the integrity, fairness, and transparency of the recruitment process, and may result in restrictions on participation or removal from the panel where appropriate.

3.4.2 Procurement and Supplier Tenders

All workers involved in procurement activities, including the evaluation, assessment, or approval of supplier tenders, must identify and manage conflicts of interest in accordance with this Policy. This may also include the authorisation of payment of invoices once a procurement process has been completed. Prior to participating in any stage of a tender or procurement process, involved persons are required to assess whether any actual, potential, or perceived conflict of interest exists, including personal, family, professional, or financial interests with any tendering entity.

Where a conflict is identified, it must be formally disclosed by completing *Attachment 1 - Declaration of Conflict of Interest and Management Plan*. Declared conflicts will be assessed and managed to ensure procurement decisions are made objectively, fairly, and in the best interests of MASP, and may result in restricted involvement or exclusion from the process where appropriate.

3.5 Failure to Disclose a Conflict of Interest

Failure to declare or manage a conflict is a breach of this Policy. It may lead to disciplinary action which will be dealt with in accordance with MASP's Performance Management, Counselling & Discipline Policy.

4. Roles and responsibilities

Role	Responsibility
Executive Team	• Endorsement of the policy. • Reviewing and approving low and medium level COI within their program areas.
Board of Directors	• Approval of the policy. • Monitors and reviews high-level conflicts reported by the CEO or Executive Leadership Group.
CEO	• Leads the implementation and consistent application of this policy across MASP. • May approve or restrict involvement of staff in particular matters where a conflict exists.
Executive Assistant	• Maintaining the register of conflicts of interest and all associated records
All Staff	• To understand and comply with this policy at all times.
People & Culture	• Ensuring staff are reminded of their obligations to consider this policy when commencing a recruitment process or participating in an interview panel.

5. Definitions

MASP	Mallee Accommodation and Support Program Ltd.
CEO	Chief Executive Officer
Executive Leadership Group (ELG)	Chief Executive Officer Director of Client Services Director of Corporate Performance Director of Finance Director of Practice
Senior Leadership Group (SLG)	ELG Members Manager Children, Youth & Families Manager Corporate Services Manager Family Safety Manager Homelessness Support Manager Incident Response & Investigations Manager People & Culture Manager Residential Services

6. Related Documents

This policy is implemented in conjunction with the following related documents:

Policies	• Code of Conduct Policy • Governance Policy • Performance Management, Counselling & Discipline Policy • Privacy & Confidentiality Policy • Staff Grievances Policy • Whistleblower Policy
Procedures	• Privacy & Confidentiality Procedure • Staff Grievance Procedure
Instructions and Guidelines	• Appendix 1 – Guide to Rating Conflicts of Interest • Appendix 2 – Strategies to Manager Conflicts of Interest
Forms and Templates	• Attachment 1 – Declaration of Conflict of Interest and Management Plan

7. Legislation and other References

Related Legislative Acts and other sources of Authority	• Privacy Act 1988 (Cth) • Corporations Act 2001 (Cth)
Related Standards, Guidelines and other References	• Performance Standards for Registered Housing Agencies • DFFH Victorian Housing Register Operational Guidelines • Guidelines for Registered Housing Agencies published by DFFH • Commonwealth Ombudsman • Disability Services Commissioner • Human Services Standards • Mandatory Reporting • Child Safe Standards • Complaint Handling Guide – upholding the rights of children and young people

Appendix 1 – Guide to Rating Conflicts of Interest

The table below provides a guide to assess the severity of conflicts of interests so they can be appropriately managed.

The examples provided in the Table below are not exhaustive and are simply provided to illustrate some of the conflicts of interest that might arise within MASP.

Rating	Description	Example
Significant – High	An interest that is direct, significant, and closely connected to a MASP decision, transaction, or activity that the individual's impartiality cannot be assured, and where reasonable members of the public would expect the individual to be completely removed from the process to protect MASP's integrity.	- Has a direct financial interest or personal interest with an entity tendering for work with MASP - Stands to benefit in any material way in the exercise of their duties
Medium	An interest that could influence decision-making or be reasonably perceived as doing so, but where the individual's influence can be effectively managed through controls such as register, restricted participation, or recruitment of third-party reviewer.	- Stands to benefit in any material way in the exercise of their duties, but can be easily restricted from the decision-making process. - A partner of a manager/supervisor in the client services team provides trades services to MASP's Social Housing portfolio
Low	An interest that is remote, immaterial, or unlikely to influence decision-making, and would not reasonably be perceived by an external party as compromising integrity. The individual has limited or no decision-making authority over the matter.	- A partner of a non-manager / supervisor in the Client Services team provides trades services to MASP's Social Housing portfolio - A non-manager / supervisor plays netball with a local business owner that MASP engages for services unrelated to their employment area.

Appendix 2 – Strategies to Manage Conflicts of Interest

The table below contains a number of management strategies which can be used for actual or perceived conflict of interests.

Strategy	When most suitable
Register – registering the existence of an actual, perceived or potential conflict of interest. Ensures managers are aware of conflict so the effective supervision can be carried out. Provides transparency for affected persons.	All conflicts of interest should be registered regardless of what additional management strategies are implemented. For low conflicts of interest where recording the conflict of interest is sufficient to maintain transparency.
Restrict – restrictions are placed on your involvements in the matter to oversee part or all of the process that deals with the matter. Examples: • Removal from any role in decision making • Refraining from engaging in debate about the issue • Having restricted access to relevant information and documents It is important that affected parties know what management strategy has been adopted to maintain transparency in decision making.	Individual can be effectively separated from the activity or process giving rise to the conflict. The conflict of interest is not likely to arise frequently. Low or medium levels of conflict.
Recruit – recruit a disinterested third party to oversee or review part or all of the process that deals with the conflict.	If it is not feasible or desirable to remove the individual from the decision-making process. For example, where there is a perceived conflict of interest that has only been identified near the completion of the process or after the making of a decision. Medium levels of conflict.
Remove – the individual is completely removed from the matter. Examples: • Redeployment of the individual to another program/team • Altering reporting lines to different supervisor This strategy should be developed in conjunction with the employee and the Manager People & Culture.	For ongoing significant or high levels of conflict of interest where restriction or recruitment of others is not feasible or appropriate and the individual is unable to relinquish the interest causing conflict.
Relinquish – the individual relinquishes the private interest that creates the conflict.	Where the individual would rather relinquish their private interests than alter their work responsibilities
Resign – the individual resigns from the role. Any action under this strategy requires the involvement of the Manager People & Culture.	Where the individual prefers this course as a matter of personal principle.

