

Conflict of Interest Policy

Our Commitment

The Australian Salesian Mission Overseas Aid Fund (ASMOAF) is committed to ensuring that we manage conflicts of interest well that relate to all activities we undertake. ASMOAF adopts a risk management approach to the identification of areas that may have actual or perceived conflicts of interest and puts processes and procedures in place to minimise the risk.

Definition of Conflict of Interest

A conflict of interest occurs when a person's personal interest' conflict with their responsibility to act in the best interest of ASMOAF. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (i.e. as a shareholder).

A conflict of interest occurs when a person participating in decision-making is able to gain or could be perceived as gaining an advantage for themselves or for another organisation or person in which they have an interest - due to access to privileged information or from the outcome of the decision.

A conflict of interest may be actual, potential, or perceived and may involve financial or non-financial interests of the employee and the interests of a business partner or associate, family member, friend or person in a close personal relationship with the employee.

Purpose

The purpose of this policy is to;

- assist ASMOAFs management and staff to effectively identify, disclose and manage any actual, potential, or perceived conflicts of interest in order to protect its integrity.
- minimize and manage the risk of any actual, potential or perceived conflicts of interest.
- ensure board members, management and staff and stakeholders are aware of their obligations to disclose any conflict of interest that they may have and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of ASMOAF.

Scope

This policy applies to all operations of ASMOAF activities; its board, staff, stakeholders, contractors, volunteers and partners regardless of status or background.

Policy and Guidelines

All responsible persons, directors, board members, staff and volunteers disclose any real or perceived conflict of interest or any affiliation they have with an actual or potential supplier of goods and services, recipient of funds or organisation with competing or conflicting objectives.

ASMOAF is committed to the open and fair procurement of goods and services relating to all activities undertaken by our organisation.

That all conflicts of interest will be managed in a transparent and fair way.

It is the policy of ASMOAF and the responsibility of all employees and volunteers to ensure that ethical, financial and other conflicts of interest are avoided wherever possible and that any such conflicts, do not cause conflict with personnel obligations to ASMOAF.

Directors, employees and volunteers will refrain from obtaining or using any list of donors for personal or private solicitation purposes at any time during the term of their affiliation with ASMOAF.

The following examples provide some situations where it is considered a conflict of interest may, or may not, arise or exist. If an employee is in any doubt as to whether a conflict may exist, they should seek advice and clarification from their supervisor or senior management.

Activities that appear to present potential conflicts of interest or commitment include:

- Where an employee has a financial/personal interest in an organisation/supplier/contractor that ASMOAF conducts business with and could be perceived to be in a position to influence relevant business decisions.
- Activities for which employees are personally remunerated from an external source/party that involve, or may reasonably be perceived to involve ASMOAF's name, facilities, equipment and staff.
- Use of ASMOAF's information or resources for personal profit.
- Assisting an outside organisation by giving it unreasonably exclusive access to ASMOAF's information.
- An employee accepting gifts of value and/or favours from persons who would be seen to benefit from these gifts.
- An employee involved in the recruitment or supervision of another employee with whom they have, or have had, a close personal or financial relationship.



Conflict Declaration and Mitigation

Once an actual, potential, or perceived conflict is identified, the following procedure will be followed;

- All responsible persons must ensure transparency by self-declaration and the appropriate record of the declaration be made.
- Once a declaration is made, it should be discussed with the relevant (responsible person) and the discussion recorded in writing. The conflict must be recorded into the ASMOAF Conflict of Interest Register and reported to the Director.
- The Conflict of Interest Register is maintained by the Director, where the nature and the extent of the conflict is recorded, and the steps taken to address the conflict. (Disclosure of conflict will be kept confidential)

Measures to mitigate or eliminate a conflict of interest will depend on what is appropriate to the severity of the situation. All reasonable steps will be taken to eliminate the conflict of interest. Those found to have a serious Conflict of Interest may be subject to the disciplinary action as outlined in the Salesian Society (Vic) Inc. Code of Conduct.

The decision must then be documented, for example in Board minutes or in correspondence to interested parties or stakeholders.

Requests for Information

Requests for information should be sent to the Director – Salesian Missions Australia, via email (salmiss@salesians.org.au) or by phone (+61 3 9377 6060). On receipt of a request:

- the sender's request for information will be acknowledged,
- a check will be conducted that the information requested does not infringe privacy measures, and
- the information will be collated and sent in a timely manner.

Relevant Policy Documents

Salesians of Don Bosco - Code of Conduct

Review

The policy will be subject to thorough review every two (2) years.

Date of Change	Change Description	Authorised
17 th Jan 2021	Original Publication - Draft	ASMOAF Director – B.Newton

