

Conflict of Interest

Purpose

Bridge Housing Conflict of Interest Policy has been developed to:

- Protect BHL's reputation and integrity.
- Ensure that employees understand what consists of a conflict of interest and how to avoid it
- Understand the process to disclose a conflict or potential conflict of interest

Scope

This policy is for all employees including volunteers and board members, contractors and consultants engaged or employed by BHL from time to time (from herein referred to as employees).

Policy Statement

A conflict of interest exists when a personal interest (financial or otherwise) interferes, or could be perceived to interfere, or potentially interferes with your ability to carry out your work impartially.

All employees will avoid any actual, perceived, or potential conflict of interest with the primary responsibility being the disclosure of the conflict **in advance**.

Conflicts of interest are particularly likely to arise where a staff member has a family or personal relationship with another party. As such, employees are required to disclose these relationships immediately where it may affect or be seen to affect BHL's efficiency or reputation.

The following are circumstances where conflicts may arise:

- Employing or terminating employees
- Making development or promotion decisions
- When selecting consultants, contractors, or suppliers
- When allocating properties and making other decisions regarding tenants including relocations, transfers, and evictions
- Purchasing, leasing, or selling properties

Personal relationships

Conflicts of interest are particularly likely to arise where staff members have a close family or personal relationship with each other or with clients (e.g. supervising a family member, friendships or personal relationships with clients/applicants or the nomination of family members to fill an employment position within the organisation.)

Where an employee has a relationship which may affect, or be seen to affect, BHL's efficiency or reputation, the situation needs to be managed. As such, the employee concerned needs to disclose the relationship to their manager.

Definitions

Type of Conflict	Definition	Example
Actual	Arises when there is a direct conflict between a staff member's duties and responsibilities and their personal interests which influence the performance of those duties	A staff member's family member has been prioritised to receive housing services above another applicant and the prioritisation decision was made by the that staff member.
Perceived	Includes situations where it could be perceived, or appear to a reasonable person, that a staff member's personal interests could improperly or unduly influence the performance of their duties and responsibilities.	A staff member is reviewing quotes for a service and one of the potential contractors is the employer of your sibling. While the staff member believes they can make an impartial decision in the best interests of Bridge Housing, it could be perceived as being a conflict of interest.
Potential	Where a conflict of interest may arise in the future due to personal interests conflicting with or influencing required University duties or responsibilities.	A staff member is on the selection panel for a job where a relative has applied.

Managing Conflicts of Interest

The primary obligation is to disclose the potential conflict of interest **in advance**. Failing to disclose a potential conflict of interest appropriately could be regarded as misconduct.

If a staff member believes or suspects that a conflict of interest exists or potentially exists, the following steps must be taken:

- A staff member must immediately disclose any conflict of interest to his or her manager or General Manager using the Disclosure of Conflict of Interest Form
- If a staff member is in doubt as to whether a conflict exists, he or she should seek advice from their respective manager or General Manager
- If the manager or General Manager believes a conflict of interest exists then they must direct the staff member to complete a Disclosure of Conflict of Interest Form
- If the manager or General Manager is in doubt as to whether a conflict of interest exists, he or she should seek advice from the General Manager Finance and Corporate Services or the Chief Executive Officer. They will then determine whether the staff member is required to submit a Disclosure of Conflict of Interest Form
- If a General Manager or Chief Executive Officer has a conflict of interest he or she must seek advice from the Chief Executive Officer and/or the Chairperson

The Conflict of Interest Form (to be registered with the General Manager Finance and Corporate Services) will confirm an ongoing strategy for managing the conflict. This could include:

- No action, as the risk of an actual conflict is remote, and any effect would be minor
- Removing the official from certain duties related to the conflicting interest and/or involving other officers in certain parts of the duties
- Restricting access to certain information relinquishing the conflicting interest (e.g. withdrawing from an interview process that involves a family member or, if supervising a family member, having a more senior official manager to manage that employee)

Purchasing BHL property and leasing or selling to BHL

Purchasing, leasing and selling activities must be beyond reproach and completely transparent. A potential conflict of interest may arise when BHL staff or *related parties* seek to purchase BHL properties or land, to sell properties or land to BHL. Any BHL staff member or contractor or *related party* is prohibited from engaging in any of these restricted transactions.

A *related party* is someone with whom a BHL employee has a:

- Family relationship (specifically spouse, siblings, parents, grandparents, children, and grandchildren)
- Business relationship other than a casual business relationship
- Fiduciary relationship (that is, a person who is entrusted to hold, control, or manage property for another)
- Relationship in which one person is accustomed, or obliged, to act in accordance with the directions, instructions or wishes of the other.

Where a BHL employee becomes aware that a *related party* will be or has engaged in a restricted transaction, it is their responsibility to declare the situation to their manager and General Manager. The transaction itself is absolutely prohibited.

Engaging in or not informing BHL of a restricted transaction will be treated as breach of BHL Fraud Control Policy, a breach of discipline and constitutes a criminal offence.

Management Responsibility for Conflicts of Interest

Managers need to:

- Be aware of the risks of conflicts of interest amongst BHL employees they manage.
- Ensure they are flexible and supportive of employees in complex situations.
- Provide advice to employees on how to manage conflicts when they emerge.
- Record conflicts of interest on BHL's Conflict of Interests Register (through the Conflicts of Interest Form) via The General Manager Finance and Corporate Services

BHL will provide training to all staff and senior managers on conflict of interest to assist to identify and manage and perceived or real conflict of interest.

Related Policies and Reference to Regulatory Standards

- Code of Conduct
- Statement of Business Ethics
- Fraud and Corruption Policy
- Whistle-blower Policy
- Gift Policy
- Internal Audit Policy
- Notifiable Incident to Registrar
- Contractor Code of Conduct
- Procurement Policy

Regulatory Standards

- 5.1 Fraud and Corruption
- 5.2 Code of Conduct

Disclosure of a Conflict-of-Interest Form

This form is to be completed by any staff member who has a real or perceived conflict of interest or a potential conflict of interest in undertaking their obligations as an employee of Bridge Housing Limited. A copy of the completed and signed form is to be stored on the staff member's personnel file. The staff members conflict of interest management plan should be reviewed annually at the time of performance appraisal.

Staff member disclosure:

Please complete your answers in block letters

I, *(insert full name)*:

of (insert unit):

hereby declare a *(tick all applicable boxes)*:

Real ☐

Potential □

Perceived □

Conflict of interest ☐

Conflict of commitment ☐

Please provide a brief outline of the nature of the conflict (details may be included privately in a separate confidential envelope if appropriate):

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper has a slight shadow on the right side, suggesting it's resting on a surface.

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Endorsement by manager:

Please complete your answers in block letters

I, *(insert full name)*:

have reviewed the disclosure (and plan where applicable) and:

(Delete as appropriate)

- ☐ Believe that a plan to manage the conflict of interest is not required and that no further action is necessary in relation to this matter
- ☐ Believe that the plan outlined in the disclosure will mitigate or remove the conflict of interest but will continue to monitor the situation
- ☐ Cannot adequately resolve the conflict of interest with the staff member concerned and have referred the matter to the Head of this Division for resolution

Sign:

Date:

Review by General Manager /Chief Executive Officer

Please complete your answers in block letters

I, *(insert full name)*:

have reviewed the conflict-of-interest disclosure (and plan) and have taken the following action in relation to this matter:

Sign:

Position:

Date:

English

If you need help to understand this letter please contact the Telephone Interpreters Service on 131450 and ask them to contact on 8324 0800 for you at no cost. You can also come to the Bridge Housing office and ask for assistance in your language.

Simplified Chinese

如果您理解这封信有困难，请拨打电话传译服务 131450 要求电话传译 服务替您拨打 Bridge Housing，电话 8324 0800。这项服务是免费的。您也可以到 Bridge Housing 的办公室来，要求用您的语言来协助您。

Spanish

Si necesita ayuda para entender esta carta, por favor comuníquese con el Servicio Telefónico de Intérpretes al 131450 y solicite que lo contacten sin cargo con Bridge Housing al 8324 0800. También puede dirigirse a las oficinas de Bridge Housing y solicitar asistencia en su idioma.

Russian

Если для понимания содержания этого письма Вам необходима помощь, свяжитесь, пожалуйста, с Телефонной переводческой службой по номеру 131450 и попросите соединить Вас с Bridge Housing по номеру 8324 0800. За соединение платить не нужно. Кроме того, Вы можете лично посетить офис Bridge Housing и попросить об услугах переводчика.

Greek

Εάν χρειάζεστε βοήθεια για να κατανοήσετε την παρούσα επιστολή, παρακαλώ επικοινωνήστε με την Υπηρεσία Τηλεφωνικών Διερμηνέων στο 131450 και ζητήστε τους να επικοινωνήσουν με το 8324 0800 για εσάς χωρίς καμία χρέωση. Μπορείτε επίσης να επισκεφθείτε το γραφείο Bridge Housing και να ζητήσετε βοήθεια στη γλώσσα σας.

Vietnamese

Nếu cần người giúp để hiểu thư này xin quý vị liên hệ với Dịch Vụ Thông Ngôn Điện Thoại số 131450 và nhờ họ liên lạc với Bridge Housing qua số 8324 0800 cho quý vị một cách miễn phí. Quý vị cũng có thể đến Văn Phòng của Bridge Housing và xin giúp đỡ bằng ngôn-ngữ của quý-vị.

Arabic

إذا احتجت إلى مُساعدة في فهم هذه الرسالة رجاء الاتصال مع خدمة الترجمة الهاتفية على رقم 131450 واطلب منهم أن يتصلوا لك بِمَكْتَب على رقم 8324 0800 بدون تكلفة عليك. ويُمْكِنك أيضا الحضور إلى مَكْتَب Bridge Housing وطلب المُساعدة بِلُغَتِكَ.