



## Conflicts of Interest Policy

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### Policy Description:

The common law requires disclosing potential conflicts of interest as soon as they arise. This includes financial, political or personal benefit from:

- other business or professional activities;
- other commitments or interests;
- employment or accountability to other people or companies;
- membership of other companies;
- ownership of property or other assets;
- staff, contractors or board members entering into an agreement which benefits them personally or results from a position of conflict and SouthEast Housing Cooperative suffers;
- staff, contractors or board members, or their families, receive services from SouthEast Housing Cooperative where they are involved with decisions about the services.

### Applies to:

SouthEast Housing Cooperative staff, contractors, students on work placement, board members and volunteers must all follow this policy.

### Definitions:


### Relevant policy statements and/or principles:

Real or perceived conflicts of interest will be guarded against by:

- ensuring that no special treatment or favours are granted to people, or their relatives or friends as a result of their positions
- ensuring that they do not receive payments or personal gifts as a result of their position
- not entering into agreements which benefit them personally
- not participating in decisions where they may have a conflict of interest
- if necessary, removing themselves from particular discussions or decisions; and
- ensuring that they do not, as a staff member, use insider information about the organisation or job or spreading information about a client gained as a staff member. See Privacy and Information Sharing Policy.



Personal relationships are not to influence work behaviours. It could be a conflict of interest if an employee acts on the basis of personal friendship or personal animosity to advantage or disadvantage a fellow employee, supplier, service provider, customer or tenant

Employees who are uncertain whether or not they are placed in a situation where a potential or actual conflict of interest exists should seek advice from their supervisor or manager.

**Procedure:**

The behaviours listed in this code that reinforce our values outline an expected standard of behaviour. Behaviours which are contrary to the spirit or the stated requirements of this Code may result in the provision of counselling and/or guidance. In severe or repeated cases of behaviour which disregard the code, disciplinary action may be taken in accordance with SouthEast Housing Cooperative’s disciplinary policy (or other outline of disciplinary procedures) and, where appropriate, their Complaint Management policy. Actions could include:

- verbal or written warnings
- undertakings to correct behaviour, attending training or mentoring to improve behaviour
- where necessary, termination of employment or cessation of engagement with the organisation, in accordance with any relevant policies/procedures and current employment legislation.

**Related Legislation, SEHC Documents and Other Documents:**

<p>Legislation / Standards:</p>	<ul style="list-style-type: none"> <li>• Privacy Act 1988 (C’wlth)</li> <li>• Privacy and Data Protection Act 2014 (Vic)</li> <li>• Housing Act 1983 (Vic) Part VIIIA – Social Housing</li> <li>• Health Records Act 2001 (Vic)</li> <li>• Performance Standards for Registered Housing Agencies</li> <li>• DFFH Victorian Housing Register Operational Guidelines</li> <li>• Charter of Human Rights and Responsibilities 2006</li> <li>• Children, Youth and Families Act 2005 (Vic) (effective 2020 for CHOs)</li> <li>• Child Wellbeing and Safety Act 2005 (Vic) (effective 2020 for CHOs)</li> </ul>
<p>Organisational Documents:</p>	<ul style="list-style-type: none"> <li>• Privacy and Data Protection Policy</li> <li>• Complaints and Appeals Policy</li> </ul>

VHR Documents / Guidelines:	<ul style="list-style-type: none"> <li>• Allocations</li> <li>• Allocations Eligibility</li> <li>• Rent Setting</li> <li>• Privacy</li> <li>• Complaints and Appeals Policy and Procedures</li> </ul>
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### Policy Management:

Policy owner (role title):	Board
Role responsible for implementing:	Board and CEO
Review arrangements:	Every 24 months via internal review
Next Review Date:	June 2024

### Document History:

Date:	Controlled Version Number:	Author:	Approved by:	Comment:
24 June 2022	1.0	S. Morrissey (CEO)	Board	Board approved version migrated for display on SEHC website