CONFLICT OF INTEREST POLICY

INTRODUCTION

Wantaim PNG recognises that effective governance of the organisation depends on deliberate, thoughtful, and disinterested decision making by all persons holding positions of responsibility and trust on behalf of the organisation.

The organisation is entitled to the best judgment of its members, whatever the subject, and that judgment will certainly be affected if its members have a personal agenda that conflicts with the best interests of the organisation. Moreover, the organisation's work in the community depends on the community's continued trust and confidence in the integrity of the organisation; likewise, the integrity of the organisation is grounded in fair and responsible decision making by its members.

The Executive Committee of Wantaim PNG believes it is in the best interest of the organisation to establish a clear and concise conflict of interest policy. Therefore, it has set forth this policy and procedures for all organisation members with respect to conflicts of interest.

The conflict of interest policy is intended to promote the avoidance of conflicts of interest and the appearance of impropriety by organisation members. It sets the rules for conduct, including disclosure by members of personal or financial interests which may affect the business of the organisation; identifies actions incompatible with the organisation's best interests; and, establishes a process for remedying any breach of this policy.

POLICY AND EXPECTATIONS

Members of the organisation are expected to commit themselves to ethical and professional conduct. This includes the proper use of authority and appropriate decorum.

Members must represent loyalty to the interests of the organisation.

This accountability supersedes any conflicting loyalty such as that to advocacy or interest groups, business interests, personal interests or paid or volunteer service to other organisations.

Members must not attempt to exercise individual authority over the policies and operations of the organisation except through their roles as voting members of the Executive Committee or other committees.

Members in their interaction with the press and the public must recognise the inability of any individual member of the organisation to speak for the organisation, except as expressly authorised by the president of the Executive Committee.

All members must hold strictly confidential all issues of a private nature, including, but not limited to, issues related to grant application, private businesses, contributions from individuals, businesses and other private entities, and all personnel matters.
DEFINITION

Generally, a conflict of interest may occur if an interest or activity influences or appears to influence the ability of an individual to exercise objectivity or impairs the individual’s ability to perform his or her responsibilities in the best interests of the organisation.

An individual is considered to have a potential conflict of interest when:

1. He or she or any member of his or her family may receive a financial or other significant benefit as a result of the individual's position at the organisation;

2. The individual has the opportunity to influence the organisation's granting, business, administrative, or other material decisions in a manner that leads to personal gain or advantage; or

3. The individual has an existing or potential financial or other significant interest which impairs or might appear to impair the individual's independence in the discharge of her or his responsibilities to the organisation.

PROCEDURES

General Procedures

1. Each organisation member is under an obligation to the organisation and to the community served by the organisation to inform the organisation of any position he or she holds or of any business or vocational activity that may result in a possible conflict of interest or bias for or against a particular grantee, action or policy, at the time such grant, action or policy is under consideration by the board or grant-making committee of the organisation.

2. Any possible conflict of interest on the part of any member shall be disclosed to the President and made a matter of record as soon as the issue in question is raised and a possible conflict is known.

3. When the Executive Committee or any other committee is to decide upon an issue about which a person has an unavoidable conflict of interest, that person shall physically absent herself or himself without comment from not only the vote, but also from the deliberation, unless directly requested by the President or convenor of the relevant committee to provide factual information or answer factual questions that may assist the Executive Committee or any other committee in making a wise decision. In no case shall that person vote on such matter or attempt to exert personal influence in connection therewith.

4. Disclosure and abstention shall be recorded in the minutes of the meeting(s) at which the issue is discussed and decided.

1 The “family” of an individual includes his or her spouse, domestic partner, parents, siblings, children, and any relative who resides in the same household.
5. Upon or before election or appointment, each member shall sign the Conflict of Interest policy declaration.

**Grants**

6. Grants shall not be made to organisations in which organisation members or family members of organisation members are directly or indirectly involved, unless the decision to award the grant is ratified by the Executive Committee.

**Gifts**

7. As a general rule, organisation members may not receive any gift of significant value in connection with, or for the purpose of influencing, the actions of the organisation. Gifts received must be given to the organisation or shared with the organisation generally, and if acknowledgement is appropriate, acknowledged on behalf of the organisation.

8. If an organisation member believes there is an appropriate reason to make an exemption to this policy for an individual situation, he or she should discuss this with the President prior to giving or accepting the gift.

**Violations of the Conflicts of Interest Policy**

9. If the organisation’s Executive Committee or any other committee has reasonable cause to believe that an organisation member has failed to disclose actual or possible conflicts of interest, it shall inform the person of the basis for such belief and afford the person an opportunity to explain the alleged failure to disclose.

10. If, after hearing the person’s response and after making further investigation as warranted by the circumstances, the organisation’s Executive Committee or any other committee determines the person has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

**Interpretation**

11. In any situation not specifically covered by the previous sections of this policy, members shall consider carefully any potential conflict of their personal interests with the interests of the organisation and refrain from any action that might be perceived as an actual or apparent conflict of interest.
REVIEWING THIS POLICY

This policy will be reviewed every two years to assess its effectiveness, appropriateness and accuracy.

POLICY AUTHORISATION

Policy Owner                  President *Wantaim PNG*
Approved By                  Executive Committee *Wantaim PNG*
Approval Date                18.11.2018
Review Date                  no later than 17.11.2020
DECLARATION

The standard of behaviour at Wantaim PNG is that all members scrupulously avoid conflicts of interest between the interests of Wantaim PNG on the one hand, and personal, professional, and business interests on the other. This includes avoiding potential and actual conflicts of interest, as well as perceptions of conflicts of interest.

I understand that the purposes of this policy are to protect the integrity of Wantaim PNG’s decision-making process and business judgments, to enable our constituencies to have confidence in our integrity, and to protect the reputations of members.

In the course of meetings or activities, I will disclose any interests in a transaction or decision where I (including my business or other non-profit affiliations), my family and/or my significant other, employer, or close associates will receive a benefit or gain. After disclosure, I understand that I will be asked to leave the room for the discussion and will not be permitted to vote on the question.

I understand that this policy is meant to supplement good judgment, and I will respect its spirit as well as its wording.

Name: ______________________________________

Signed: _____________________________________

Date: _______________________________________