

# Skillinvest

## Staff Conflict of Interest Policy

<b>Version:</b>	2015 – 01
<b>Last Review:</b>	August 2015
<b>Next Review:</b>	August 2016
<b>Review Frequency:</b>	Annual
<b>Approval:</b>	Any updates or amendments to this policy must be approved by the Skillinvest Board of Directors



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**SKILLINVEST LIMITED**  
**STAFF CONFLICT OF INTEREST POLICY**

This policy covers the Skillinvest Limited (Skillinvest) businesses and their departments, including Longerenong College.

Skillinvest is committed to improve workplace diversity and equity and to achieve equal representation of women and men across the workplace. The organisation undertakes and is committed to establishing proactive strategies and targets to ensure diversity and equity in the workplace.

### **Introduction**

Skillinvest are providers of many services in the employment and training field to achieve our core purpose. In providing a wide range of services, the potential for conflict of interest exists.

The aim of this policy is to identify areas of potential conflict of interest in the organisation and manage any actual or potential conflicts of interests identified. The management of these identified conflicts of interest in the organisation demonstrates to our staff, customers and the community that we have an ethical approach to business and ensures there is no adverse effect on any stakeholders.

### **Areas of potential conflicts of interest**

- Where a staff member of Skillinvest or his/her family/partner, through either personal or business interest, stands to gain financially from any business dealing, program or service provided by Skillinvest.
- Where a staff member stands to gain directly or indirectly from any business dealing, service or intellectual property provided by Skillinvest to a competitor of any other business interest of that staff member or his/her immediate family/partner.
- Where a staff member stands to gain professionally or personally from any inside information, and that knowledge is used for personal or professional advantage.
- Where a division/program of Skillinvest refers flow on business to another Skillinvest division/program and that division/program is not in an appropriate position to deliver the flow on service to meet the needs of the client.
- Where a division/program of Skillinvest does not follow contract guidelines when dealing with another Skillinvest division/program.

### **Strategies to manage potential conflicts**

All of Skillinvest's different divisions/programs have independent responsibilities and objectives. Any conflict of interest would need to be accepted and approved by several individual decision makers before it impacts any stakeholder.

A register of conflicts of interest will be kept by the Chief Executive Officer. It is a company requirement that any business or personal matter which is, or could be, a conflict of interest involving the individual and or his/her role, must be declared and registered in this register.

A staff member aware of an actual or potential conflict of interest involving another staff member has a responsibility to bring this to the notice of the staff member concerned for declaration. If the staff member concerned fails to declare the situation, it is the responsibility of the other staff member to advise company management of the situation.

### **Conflict of interest handling process**

Where an actual or potential conflict of interest is declared or perceived, the General Manager will investigate the matter to identify the nature and scope of the conflict and to determine a course of action to be taken to manage the matter. The Chief Executive Officer will be informed of the matter and if identified as an actual or potential conflict, then it will be recorded in the conflict of interest register. Where the declaration of potential conflict of interest involves the General Manager, then the Chief Executive Officer will be notified and will administer this process. Where the declaration of potential conflict of interest involves the Chief Executive Officer, then the Chairperson of the Board of Directors will be notified and will administer this process.

If it is found that a conflict of interest existed during the provision of a service to a client that adversely affects, or can be seen to adversely affect the client, then the General Manager shall investigate the situation and take whatever remedial action is necessary to overcome the situation from the client's perspective. The General Manager shall also discuss the incident with those involved and take appropriate action to prevent recurrence.

### **Complaints handling process**

This process is documented in the company's Quality Manual and is handled under the provisions of Quality Management Procedure QMP-006 Issues, Problems and Feedback for Skillinvest's quality manual for their provisions.

If not adhered to by all staff, this policy may be subject to disciplinary proceedings.

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# SKILLINVEST LIMITED

## CONFLICT OF INTEREST POLICY SIGN OFF

### Skillinvest Limited Conflict of Interest Policy

Version: 2015-01

Date: June 2015

*I agree that I have read, clearly understand and agree to abide by all the terms and conditions as set out in the above named and dated policy and I have accurately completed the Staff Conflict of Interest Register below:*

Employee Name: \_\_\_\_\_

Company: \_\_\_\_\_

- I have no conflicts or potential conflicts of interest to declare;  
**OR**
- I have a conflict of interest or a potential conflict of interest to declare and have outlined the details below (*please list any financial interests or assets, or areas, which may arise as a conflict of interest to your duties as a Staff Member of Skillinvest Limited*).

**Conflicts/s of interest and/or potential conflict's of interest:**

*(e.g I am a partner in Grundig Holdings, a wholesale rope company, which employs Skillinvest Limited Apprentices and Trainees.)*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_

***If your interests change, please notify the Skillinvest Limited Executive Assistant to update your register.***

Department Manager/  
General Manager Name: \_\_\_\_\_

Department Manager/  
General Manager Signature: \_\_\_\_\_

Date: \_\_\_\_\_