



Conflict of Interests & Gifts

A/1.2.1

Purpose

To outline the process by which actual, perceived or potential conflicts (as defined in the Synod Wide Conflicts Policy A/1.2), also called “conflicts of interest”, will be acknowledged and managed by the Queensland Synod office.

Scope

This process applies to all individuals engaged in work and activities of the Uniting Church in Australia within the bounds of the Queensland Synod office including Trinity College Queensland, Raymont Residential College, Alexandra Park Conference Centre and Uniting Education Early Learning centres.

Procedure

1. Declaration of Conflict

- 1.1. All individuals have a duty to promptly disclose any conflict they may have to the person in control of a workplace using the Conflict of Interest Declaration tool (A/1.2.1.1).
- 1.2. The Conflict of Interest Declaration tool is also used by an individual to update disclosure(s) throughout the period of employment or placement until such time as the conflict(s) cease to exist.
- 1.3. The person in control of a workplace must consider conflict disclosure in relation to its relevance to the Conflicts Policy (A/1.2) and develop a proposed plan to reduce or mitigate the impact of the conflict. The mitigation plan is recorded on the Conflict of Interest Declaration tool. Where the mitigation plan will involve a change to the individual’s duties or responsibilities, the person in control of a workplace should consult People and Culture.
- 1.4. The General Secretary will review the mitigation plan and provide a final decision in relation to a plan to reduce or mitigate the impact of the conflict. The decision may include acceptance of the mitigation plan, a modified version of the mitigation plan, a new mitigation plan or agreement that a mitigation plan is not required. Subject to the severity of the conflict, the decision may also include termination of employment or placement if no mitigation plan is acceptable. The decision is documented on the Conflict of Interest Declaration tool and an entry is made to the Conflict of Interest and Gift Register (A/1.2.1.2).
- 1.5. The completed Conflict of Interest Declaration form and Conflict of Interest and Gift Register is to be kept secure with access restricted to those individuals who reasonably need access to fulfil responsibilities under this procedure. Restricted access applies to electronic and hard copy versions.
- 1.6. The person in control of a workplace, or their delegate, must inform the individual of the mitigation plan and ensure that the mitigation plan is implemented, monitored and reviewed.

2. Gifts

- 2.1. A potential conflict of interest can exist where an individual is offered or receives a gift above \$100 (“nominal value”).
- 2.2. Gifts given as part of normal customary hospitality or in accordance with social custom (e.g. gifts at Christmas) or when individuals leave a workplace are considered token gifts of appreciation or gifts



of a symbolic nature and will not be considered to result in a potential conflict of interest. Such gifts do not need to be disclosed.

- 2.3. It is not acceptable for an individual to give or receive a gift or favour that may compromise his or her judgement, create a conflict of interest, damage relationships with others or indicate any favouritism or prejudice towards a person or group of people. Individuals are encouraged to take all reasonable steps to politely discourage or decline gifts and any other offers of hospitality or benefits.
- 2.4. Attendance at functions or events where the individual is representing the Queensland Synod in an official capacity or conducting official business is not considered a gift for the purposes of this process. Such attendance is consistent with the function of the Queensland Synod and an individual's position, rather than a private benefit.
- 2.5. Where it is not possible or impolite to decline a gift and the gift is estimated to be above the nominal value, the gift must be declared using the Conflict of Interest Declaration tool and recorded on the Conflict of Interest and Gift Register. The proposed mitigation plan in the Conflict of Interest Declaration tool must identify the proposed treatment of the gift, such as personal consumption/use, donating the gift, sharing the gift with colleagues or sharing the gift as part of a Queensland Synod function.
- 2.6. While completion of the Conflict of Interest Declaration tool is not required for a gift below the nominal value, individuals should in all instances advise the person in control of a workplace if an offer of any gift is received.
- 2.7. If an individual is in doubt regarding whether a gift should be declared, they should seek direction from the person in control of the workplace.

3. Annual Review

- 3.1. The Governance Secretary, or their delegate, will undertake an annual review in June each year of the Conflict of Interest and Gift Register.
- 3.2. Where the Register entry relates to a current conflict of interest, the individual will be requested to update the Register by completing a Conflict of Interest Declaration tool to verify if the conflict remains current, has changed or no longer exists.
- 3.3. Where the Register entry relates to a conflict for a fixed period of time or the individual is no longer employed or in placement, the entry will be closed.
- 3.4. Where the Register entry relates to gifts, the review will consider the frequency of gifts to the same individual, or from the same organisation, and the combined value of the gifts.

Related documents

Privacy Act 1988 (Cth), including Schedule 3 - National Privacy Principles

A/1.2 Conflicts Policy

A/1.2.1.1 Conflict of Interest Declaration

A/1.2.1.2 Conflict of Interest and Gift Register

Definitions

Term	Meaning
Queensland Synod office	Means the work and activities of the Uniting Church in Australia performed within the bounds of the Queensland Synod Office including



Term	Meaning
	Trinity College Queensland, Raymont Residential College, Alexandra Park Conference Centre and Uniting Education Early Learning centres.
Individual	Means all employees (lay staff), placements and volunteers engaged in work and activities of the Uniting Church in Australia within the bounds of the Queensland Synod Office
Person in control of a workplace	For the purposes of the policy definition of “relevant person in charge”, person in control of a workplace means the manager responsible for individuals in a workplace or activity of the Queensland Synod.
Actual Conflict	Involves a conflict between an individual’s duties and responsibilities to the Synod Office and the individual’s private, professional, business or other interests or duties to other organisations.
Perceived Conflict	Exists where it would appear to an independent observer (either from within or from outside of the Synod Office) that an individual’s private, professional, business or other interests or duties to other organisations do or could improperly influence the performance of the individual’s duties and responsibilities to the Synod Office.
Potential Conflict	Arises where an individual’s private, professional, business or other interests or duties to other organisations could conflict with that individual’s duties and responsibilities to the Synod Office
Gift	Includes, but is not limited to free or discounted items, intangible benefits, hospitality, inducements given or promised to individuals to influence the performance of their role, items provided by organisations (e.g. from a visiting delegation from another jurisdiction) and enduring items (e.g. work of art or consumables such as wine or chocolates).

Revisions

Document number	A/1.2.1				
Version	Approval date	Approved by	Effective date	Policy owner	Policy contact
2.0	29.07.2021	Executive Director Shared Services	01.08.2021	Governance Secretary	Governance Secretary
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