

Skillinvest

Staff Conflict of Interest Policy

Version:	2024 – 01
Last Review:	May 2024
Next Review:	May 2025
Review Frequency:	Annual
Approval:	Any updates or amendments to this policy must be approved by the Skillinvest Senior Leadership Team



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SKILLINVEST LIMITED

STAFF CONFLICT OF INTEREST POLICY

Introduction

The purpose of this policy is to ensure that all staff and workers effectively identify, disclose and manage any actual, potential or perceived conflicts of interest and that they are identified, disclosed and managed in order to protect the integrity of Skillinvest and manage risk. The management of any identified conflicts of interest in the organisation demonstrates to our staff, workers, customers and the community that we have an ethical approach to business and ensures there is no adverse effect on any stakeholders.

This policy aims to promote Skillinvest's culture which is integrity, respect and quality. Skillinvest aims to ensure that all staff and workers are aware of their obligations to disclose any conflicts of interest that they may have and to comply with this policy to ensure the effective management of conflicts.

Application

This policy applies to all employees (full time, part time, casual and temporary) of Skillinvest. This policy also applies to contractors, consultants and suppliers (workers).

Areas of potential conflicts of interest

Conflicts of interest may be actual, perceived or potential. A clash between an employee's or worker's personal or work interests, may give rise to an actual, perceived or potential conflict. They may also be financial or non-financial. A conflict of interest can be:

- Actual, where a conflict actually exists;
- Perceived, when a conflict is only believed to exist; and/or
- Potential, when a conflict is a future possibility.

Actual conflict of interest occurs where there is a real conflict between staff/workers performance and personal or private interests. Actual conflict may also impact on the staff/workers ability to perform their role to the required standards.

Perceived conflict may arise where another individual may form the opinion that private interests may improperly influence the staff/workers performance or behaviours.

Potential conflict of interest may arise where a staff member's/workers private interests could conflict with their performance or behaviours in the workplace.

All staff/workers are required to actively avoid being placed in situations where there may be actual, perceived or potential conflict of interest. Skillinvest staff/workers should demonstrate integrity by avoiding any real, perceived, or potential conflict of interest.

In addition, conflict of interest may arise:

- Where a staff/worker 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/worker 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/worker or his/her immediate family/partner.

- Where a staff/worker 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.

Gifts and hospitality

Staff and other workers may only accept and give token gifts and modest hospitality and professional courtesies. Staff and other workers must not accept or give a gift or courtesy that could either lead to, or be seen to lead to, a conflict of interest such that our judgment is prejudiced or improperly influenced.

Strategies to manage potential conflicts

All of Skillinvest's different departments/programs have independent responsibilities and objectives. Any conflict of interest would need to be accepted and approved by the CEO and other senior leaders before it impacts any stakeholder.

A staff register of conflicts of interest will be kept by the P&C Department. The Management register (including Directors) is kept in Corporate. 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. This will be updated on an ongoing basis, or as required.

A staff/worker 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/worker concerned for declaration. If the staff/worker concerned fails to declare the situation, it is the responsibility of the other staff /worker to advise management.

Conflict of interest handling process

Where an actual or potential conflict of interest is declared or perceived, the relevant 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 a 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 a client, then the relevant General Manager shall investigate the situation and take whatever remedial action is necessary to overcome the situation from the client's perspective. The relevant General Manager will also discuss the incident with those involved and take appropriate action to prevent recurrence.

Roles and Responsibilities

All staff/workers at Skillinvest have a role in identifying and disclosing conflicts of interest. Specific responsibilities are as follows:

- Senior Leadership Team - Ensure compliance of this policy and manage conflicts of interest promptly and with integrity.
- Leadership Team - Provide leadership in implementing and giving effect to this Policy and facilitate compliance. Take appropriate action for breaches of this Policy.
- Staff/workers – maintain awareness of potential conflicts of interest and avoid them where possible. Promptly identify and disclose any actual or potential conflicts of interest that might be perceived to affect the proper performance of their role.

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 Feedback for Skillinvest’s quality manual for their provisions.

Policy Breach

Any breach of this policy may result in disciplinary action, up to and including termination of employment.

Related Policies

- Duty of Care and Code of Conduct Policy
- Professional and Personal Relationships in the Workplace
- Fraud and Corruption Policy
- ELMO learning module - Conflict of Interest

Skillinvest Diversity and Inclusiveness Clause:

Skillinvest values and promotes diversity, fairness and inclusiveness in the workplace and is committed to ensuring workplace diversity and inclusiveness through establishing proactive strategies, policies and procedures. Skillinvest aims to ensure that all employees, clients, business partners and stakeholders are treated with respect, dignity and fairness to ensure Skillinvest promotes inclusiveness and positive working relationships.

Skillinvest is committed to recognising the value of diversity and inclusiveness in the workplace and ensures that work practices promote equal opportunity and are non-discriminatory.