

# Conflict of Interest Policy (Employees)

## Purpose

To ensure HousingFirst effectively identifies, discloses and manages any potential, actual, or perceived conflicts of interest.

## Scope

This policy applies to all HousingFirst employees, contractors and volunteers. Conflict of interest related to HousingFirst directors is outlined in the Code of Conduct (Directors and Officers) Policy and associated Procedure.

## Policy Statement

A conflict of interest exists when a personal interest (financial or otherwise) interferes, or could be perceived to interfere, or potentially interferes with an individual's ability to carry out work impartially.

All employees will avoid any actual, perceived or potential conflict of interest with the primary responsibility being the disclosure of the conflict in advance.

Conflicts of interest are particularly likely to arise where a staff member has a family or personal relationship with another party. As such, employees are required to disclose these relationships immediately where it may affect or be seen to affect HousingFirst's efficiency or reputation.

The following are circumstances where conflicts may arise, but are not limited to:

- Employing or terminating employees
- Making development or promotion decisions
- When selecting consultants, contractors or suppliers
- When allocating properties and making other decisions regarding tenants including relocations, transfers and ending tenancies
- Purchasing, leasing or selling properties.

## Managing conflicts of interest

The primary obligation of employees is to disclose the potential conflict of interest in advance. Failing to disclose a potential conflict of interest appropriately could be regarded as misconduct (see Code of Conduct – Employees).

If an employee believes or suspects that a conflict of interest exists or potentially exists the employee must immediately disclose any conflict of interest to the General Manager using the Conflict of Interest Declaration Form.

The Conflict of Interest Declaration Form will confirm an ongoing strategy for managing the conflict. This could include:

- No action, as the risk of an actual conflict is remote, and any effect would be minor
- Removing the staff member from certain duties related to the conflicting interest and/or involving other staff members in certain parts of the duties
- restricting access to certain information relinquishing the conflicting interest (e.g. withdrawing from an interview or panel selection process that involves a relative).

## Related Information

HousingFirst Code of Conduct (Employees)

HousingFirst Conflict of Interest (Employees) Form

## Transparency and accessibility

This policy will be available at [www.housingfirst.org.au](http://www.housingfirst.org.au)

## Version control

<b>Version</b>	1	<b>Review frequency</b>	3 years
<b>Date</b>	May 2019	<b>Review date</b>	May 2021