

## Summary

Life Without Barriers (LWB) is committed to integrity, transparency, and ethical decision-making. This guideline outlines principles for identifying, declaring and managing conflicts of interest across our organisation. All employees, board members, contractors, volunteers and carers are responsible for declaring any actual, perceived or potential conflicts of interest.

Conflicts of interest will be managed in alignment with:

- Relevant Policy Statements (including Organisational Accountability, People and Culture, and Legal and Regulatory Compliance)
- LWB Values and Code of Conduct
- Relevant policies such as the NDIS Managing Conflict of Interest, Secondary Employment and Procurement
- LWB Governance Charter and Risk Management Framework
- Any applicable legal, regulatory or contractual obligations.

This Policy Guideline is subject to variation from time to time, at the sole discretion of LWB. It is not intended to be legally binding and does not form part of employees' contracts of employment.

## Scope and Application

This Policy Guideline applies to all employees, the Board, contractors, volunteers and carers of Life Without Barriers.

## Aim of the Policy Guideline

The aim of this Policy Guideline is to:

- Safeguard the reputation and integrity of LWB to its employees, the Board, funders, service users, the community and any other parties in contact with LWB;
- Ensure public trust in LWB's services and management is maintained; and
- Ensure sound, fair, efficient and objective decisions are made, allowing LWB to achieve its stated objectives within the framework of the organisation's strategy, vision, mission and values.

## Definitions

A **conflict of interest** is a situation in which a person has a private or personal interest sufficient to influence or appear to influence objective decision making or actions in their role. Conflicts of interest exist if a person's position or authority may be used to influence or make decisions that lead to any form of financial or personal gain (or avoidance of loss) for that person or for their family or friends, whether actual or perceived.

- **Actual conflict:** involves a direct conflict between current duties and private interests.

- **Perceived conflict:** where it appears that duties could be improperly influenced.
- **Potential conflict:** where a conflict may arise in future.
- **Pecuniary conflict:** involves financial gain or loss.
- **Non-pecuniary conflict:** does not involve financial gain or loss, but rather involves personal relationships or affiliations.

### **Examples of Conflict of Interest**

Examples include but are not limited to:

- Contracts between LWB and an organisation in which the person has an interest
- Holding a material shareholding in an organisation dealing with or competing with LWB
- Professional affiliations or advisory roles with regulatory bodies or funders
- Personal relationships (family, intimate or otherwise) with LWB employees, carers, contractors or clients that could influence decision making
- Dual roles within LWB (e.g. being both a foster carer and employee), unless explicitly approved and managed
- Participation in recruitment, performance, disciplinary or employment-related decisions where personal relationships exist.

## **Conflicts of Interest Policy Guideline**

All individuals must proactively disclose any actual, perceived or potential conflict of interest as soon as practicable. They must not make decisions or take actions that may result in personal gain or provide a benefit to themselves, family members or close contacts.

Individuals must not participate in decision-making processes where a conflict exists unless a mitigation plan is approved. Employees may not simultaneously hold foster or kinship carer roles unless explicitly approved and managed through a documented strategy – for example, where the dual role serves a peer support or ambassador function.

Managers are responsible for reviewing disclosed conflicts and putting in place mitigations strategies to manage or eliminate risks. Conflicts must be disclosed using the Conflict Disclosure Form or via myHR and will be recorded on the Conflict of Interest Register.

Disclosures will be treated confidentially in line with LWB's privacy obligations. Where a conflict of interest no longer applies, the individual must inform their manager.

### **If a conflict is unable to be resolved**

If a conflict of interest cannot be adequately mitigated or managed, further action may be required to protect the integrity of LWB's operations. Depending on the severity and nature of the conflict, this may include:

- reassignment of duties, roles, or reporting lines
- withdrawal from decision-making processes
- resignation from boards, committees, or external roles
- or, in some cases, termination of employment or engagement.

These decisions will be made in consultation with senior leadership and documented as part of the conflict management process.

**Non-compliance with this Policy Guideline**

Failure to comply may result in:

- Disciplinary action, up to and including termination of employment
- Termination of a service agreements
- Reputational or legal consequences for the individual or LWB.

**Policy Guideline Commitments**

LWB is committed to fostering a culture of transparency and accountability by encouraging the proactive identification, disclosure and management of conflicts of interest. We will maintain a central and accessible register of all disclosed conflicts to support effective monitoring and oversight.

To ensure consistency and understanding, LWB will provide guidance, training and support materials to help all parties understand their responsibilities under this policy. These resources will support informed decision-making and help prevent real or perceived conflicts from undermining trust in our organisation.

**Performance Indicators**

Key performance indicators include:

- Number and completeness of disclosure forms held on file or recorded through myHR; and
- Stakeholder trust reflected in re-accreditation, licensing outcomes and public confidence.

**Version Control**

Previous version	Doc ID
Conflict of interest	POLICY-4-9471
HR 2002.03.000 Conflict of Interest Policy.docx	POLICY-4-295