

Conflict of Interest Policy (Adopted-Assembly)

Functional Area: Management

Date approved: 24 March 2026

Board Resolution: UWB20260324-12

1 Context

UnitingWorld works with a wide range of church partners, communities, donors, suppliers and government agencies, creating situations where personal or organisational interests could conflict—or be seen to conflict—with our responsibility to act in the best interests of the people we serve. The Australian Council for International Development (ACFID) Code of Conduct and the Department of Foreign Affairs and Trade (DFAT) Accreditation Framework require us to manage these risks through clear, transparent governance that prevents improper influence, personal benefit or misuse of position.

A conflict of interest policy protects the integrity of our decisions, supports ethical leadership, and maintains the trust of partners, donors and the public. It promotes fairness and accountability by ensuring decisions about partnerships, funding, procurement, recruitment and programs are made on merit rather than personal advantage, helping maintain the trust of partners, donors and the communities we serve.

To support this, UnitingWorld adopts the Conflict of Interest Policy of the Uniting Church in Australia National Assembly (Assembly). Some aspects of the Assembly policy require modifications to reflect UnitingWorld's specific operational context, governance arrangements, and compliance obligations. These modifications are set out in the policy commitments and implementation below.

2 Scope

This policy applies to all UnitingWorld Representatives (Representatives), defined as any personnel funded by or undertaking tasks on behalf of UnitingWorld, as per the Governance Framework Introduction.

3 Policy Commitments

We will adopt the policy statement contained with the Conflict of Interest Policy of the National Assembly.

4 Policy implementation

The following references are to be adjusted for UnitingWorld's implementation of the Assembly policy:

- References to the Assembly are taken to mean UnitingWorld.
- Representatives not listed in the Assembly policy, including partners and contractors, are required to declare and manage conflicts of interest in accordance with their relevant agreements or contracts with UnitingWorld.
- UnitingWorld will maintain appropriate procedures, templates including for registers, declarations and agreements to support this policy.

- For oversight, conflicts of interest will be a standing agenda item at all Board and Board sub-committee meetings to enable regular declaration, review and management of any actual, potential or perceived conflicts.
- All Board members and staff will complete a conflict of interest declaration on commencement, and all Representatives (including staff, Board members, contractors and others acting on behalf of UnitingWorld) will be required to promptly disclose any new or changed conflicts as they arise.
- UnitingWorld will maintain a Gifts and Entertainment Procedure, to support managing the acceptance of gifts, benefits or hospitality by staff and others representing or associated with UnitingWorld.

5 Related Resources

- Financial Wrongdoing Policy
- People and Culture Policy
- Professional Conduct Policy and Code of Conduct
- Whistleblower Policy

6 Glossary of Terms

As per Assembly policy.

7 Review Schedule

Date of next review: As per Assembly policy, no later than March 2031

The Uniting Church in Australia

Section 1 - Governance and Leadership

(1.04) Conflicts of Interest Policy

Document History

Version	Date	Author	Comment
1.0	22 July 2013	R Groves	Approved by AFARC 22 July 2013
2.0	February 2018	J Harris / L Iosifidis	Updates as per AFARC review
3.0	April 2025	D Field/L Iosifidis	All policy review

Approval and Distribution

The following table lists the approvals for this document.

Name / Position / Committee	Approval	Initial Date
Assembly General Secretary	Supported	July 2025
Assembly Standing Committee	Approved	July 2025

Overarching Policy Framework

This policy applies to the Assembly which is defined to include the Assembly Secretariat, Agencies, and other entities of the Assembly. Agencies and other entities may choose to develop their own policy, however, that policy must remain consistent with this policy, which should be considered as the 'minimum standard', unless otherwise determined and approved by the approving governance body or person.

Thereafter, throughout this policy we will refer to the Assembly (as opposed to other description like Assembly and Agencies etc.)

Background

Members of Governance Bodies, employees, volunteers, Ministers, consultants and contractors have a duty under common law to act in the best interests of the organisation in which they serve. They should act in good faith and should not seek to gain any personal benefits from their service for themselves, their associates, their families, their friends or organisations the person is associated with (other than remuneration or benefits as specified in their employment, appointment, placement or contract arrangements). Employees and Ministers have additional obligations that are established in the relevant Human Resources Policies and Procedures, in their employment contracts, and in the relevant Codes of Conduct.

Conflicts of interest can be real, potential or perceived. They can be direct or indirect. They can involve financial, personal, influence and loyalty aspects. Conflicts of interest include matters that would be regarded as "material personal interests" or "related party transactions" under the provisions of the Corporations Act. In the context of the Church, there may be

situations where there is a 'conflict of roles' – this is where someone holds two or more roles that have competing responsibilities, obligations, or expectations.

While conflicts of interest are not necessarily wrong in themselves, they must be disclosed and effectively managed. If not, the functioning of an organisation can be undermined and its reputation damaged.

Policy Statement - General

1. All staff, volunteers and members of a Governance Body must declare new or changes to existing interest promptly to their Manager or Chair.
2. For governing body members, the governance body will collectively decide if the interest declared is a perceived, potential or actual conflict and determine the appropriate response.
3. For staff or volunteers, the Manager will decide if the interest declared conflicts with the interest of the relevant organisation and determine the appropriate response to the conflict.
4. Conflict of Interest Registers must be maintained by the Assembly General Secretary and/or the National Directors for each Agency.
5. Each Agency's Conflicts of Interest Register must be reviewed annually by its governance body or its Audit Committee.

Policy Statement - Governance

As soon as a member of a Governance Body becomes aware that a real, potential or perceived conflict of interest may exist, he or she must notify the relevant Chair and/or Executive Officer at the earliest opportunity. The conflict of interest could apply to the member's role on the Governance Body, an ongoing issue or a single one-off agenda item. The interest must be declared for all instances.

The Governance Body will determine the impact or seriousness of the potential conflict and the appropriate response. The Chair and/or Executive Officer must be advised of any significant change in the nature of the interest.

Policy Statement - Management

As soon as an employee, volunteer, Minister, consultant or contractor becomes aware that a real, potential or perceived conflict of interest may exist, he or she must notify the relevant manager at the earliest opportunity. After consultation, the manager will determine the seriousness of the conflict and the appropriate response. The manager should also be advised of any significant change in the nature of the conflict of interest.

Further Information and Guidelines

The Appendix contains additional information about the nature of conflicts of interest and appropriate responses.

Related Governance Policy

- 1.12 - Speak-out Policy
- 1.15 - Fraud Prevention Policy

Policy Owner

Assembly General Secretary

Appendix - Policy Guidance

Conflicts of Interest that can arise - Governance

Conflicts of interest can occur when a person's private or business interests conflict with his or her duties as a member of a Governance Body. Conflicts of interest can also arise between a person's duties when engaged with different Councils of the Church or other organisations. Members have a duty to declare, at the earliest opportunity, that a conflict of interest may exist, and to take steps to resolve it. If in doubt regarding a particular situation, it should be discussed with the relevant Chairperson and/or Executive Officer.

A useful guide for Governance Body members is available on the ACNC web site [Managing conflicts of interest | ACNC](#).

Conflicts of Interest that can arise - Management

Conflicts of interest can occur when a person's private or business interests conflict with his or her duties as an employee, volunteer, Minister, consultant or contractor. Conflicts of interest can also arise between a person's duties as an employee, volunteer, Minister, consultant or contractor when engaged with different Councils of the Church or other organisations. Employees, volunteers, Ministers, consultants and contractors have a duty to declare, at the earliest opportunity, that a conflict of interest may exist, and to take steps to resolve it. If in doubt regarding a particular situation, it must be discussed with the relevant manager.

Advice of a Real, Potential or Perceived Conflict of Interest

The advice provided to a Chair, Executive Officer or manager must clearly state the nature of the conflict of interest and the steps being taken to resolve it. Such advice should be provided as soon as possible after the person becomes aware that a conflict may exist.

Resolution Process for Conflicts of Interest

Arrangements that involve real, potential or perceived conflicts of interest are not necessarily prohibited. Rather, there must be a transparent process where all interests are declared, addressed with care and managed consistently and effectively. Nevertheless, in some circumstances, it may be possible or desirable for conflicts of interest to be avoided completely. The expectation is that people associated with the Assembly and its Agencies will always meet or exceed minimum community standards and the Assembly's Values.

In the Resolution of Conflicts of Interest affecting Governance and Management (see below), the individual can be asked to resolve the conflict i.e. not to leave it in place.

Resolution of a Conflict of Interest - Governance

Professional and commercial work undertaken for an organisation by members of its Governance Body raises significant implications relating to community standards, ethics, values, perceptions of the Uniting Church, and the good governance of the organisation. Each identified real, potential or perceived conflict of interest needs to be considered individually, and a range of solutions may be appropriate. Depending on circumstances, the Chair in consultation with the governance body members shall determine the appropriate option to be followed, such as:

- The Member may participate in a discussion, then be asked to abstain from voting.
- The Member may participate in a discussion, then be asked to leave the meeting while a particular decision is made.
- The Member may be asked to leave the meeting while a particular item is under discussion.
- The Member may choose to resign or be asked to resign.
- The Member may choose to relinquish their external interest that is causing the conflict.
- In exceptional circumstances, a Governance Body may terminate a person's membership.

Resolution of a Conflict of Interest - Management

Each identified real, potential or perceived conflict of interest needs to be considered individually, and a range of solutions may be appropriate. Depending on circumstances, the Manager shall determine the appropriate option to be followed, such as:

- Word of caution or instruction - verbal or written.
- Transfer of some duties to another person.
- Transfer to other duties.
- In exceptional circumstances, where a breach has occurred of sufficient gravity, dismissal.

Recording a Conflict of Interest - Governance

As early as possible in every meeting of a Governance Body, a specific Agenda item should give members and guests the opportunity to declare any conflicts of interest that may exist. Reference to specific items on the Agenda will often be appropriate. The Minutes of meetings must record any conflicts of interest declared.

If a standing conflict of interest exists, it must be declared initially and repeated at least annually. Interest Registers are maintained by the Assembly General Secretary and by the National Directors of all Assembly Agencies. An example of an Interest Register is shown below. The Chair is responsible for ensuring that each conflict of interest is recorded in the appropriate Interest Register.

Recording a Conflict of Interest - Management

An appropriate note is recorded on the relevant register. If a standing conflict of interest exists, it must be declared initially and repeated at least annually.

Interest Registers are maintained by the Assembly General Secretary and by the National Directors of all Assembly Agencies. An example of an Interest Register is shown below. The Manager is responsible to ensure that each conflict of interest is recorded in the appropriate Interests Register.

Acceptance of Gifts

Conflicts of interest are often associated with the offering or acceptance of gifts or entertainment. Conflicts of interest should always be resolved in favour of the Assembly or the Assembly Agency, not in favour of the employee, volunteer, Minister, consultant, contractor, or member of a Governance Body. This may mean that the person should decline to accept gifts. However, in some cultures, declining the gift could cause offence. Another option might be for the gift to be given to the Assembly or the Assembly Agency, if this is identified as being in the interest of the Assembly. Details relating to the acceptance of Gifts by staff and people representing or associated with the Assembly and its Agencies are set out in People and Culture Policy 3.13 - Gifts and Entertainment Policy.

Interests Register (example)

Name of employee, volunteer, Minister, consultant, contractor, member of Board, Committee or Council and role/position	Description of Interest and real, potential or perceived conflict	Self, family member or friend	Current or when ceased	Steps being taken to resolve conflict of interest
Mr T Smith Member of ASC Director of XYZ	XYZ supplies HR and IT services to the Assembly Office and UnitingWorld	Self	Current	
Rev. A. Jones Director of Ministry in Frontier Services	Ms P. Jones (wife) is CEO of Government Department providing funding for all aged care services in the Northern Territory	Wife	Current	
Ms F. Thomas P.A. to the Assembly General Secretary	Appointed to become the next Chairperson of the Board of UnitingCare, Synod of NSW and the ACT	Self	Starting 1/7/2013	
Mr P. Brand AFARC Chairperson Member of Assembly's Investment Committee	Mr G. Brand (son) has recently been appointed as Managing Director of the Assembly's Auditor	Self and Son	Current	

Conflict of Interest Process - Overview

