

Conflict of Interest Policy	Doc No.	POL--005-2
	Review Officer:	Group Chief Governance Officer
	Authorised by:	Compass Board of Directors
	Effective Date:	17/12/2018
	Next Review	31/12/2021

Introduction

The Compass Group is committed to ensuring high standards of ethical conduct and accordingly places great importance on making clear any actual, perceived or potential conflicts of interest of directors, Governance Committee members and Workers of Compass.

In addition, there is an additional legal expectation that directors exercise their powers in what they consider to be the best interests of the Parent Company and cannot allow themselves to be placed in a situation where the exercise of their powers and duties are in any way restrained or conflicted.

Purpose

This policy has been developed to provide a framework for declaring actual, perceived and potential conflicts of interest and elaborates the responsibility of directors, Governance Committee members and Workers of the Compass Group with respect to conflict of interest described in the Compass Code of Conduct.

The objectives of this policy are to:

- a) build and sustain a culture of integrity by:
 - i. taking steps to ensure that, as far as reasonably possible, conflicts of interest are avoided; and
 - ii. where such conflicts do, or may arise, promoting full and thorough disclosure.
- b) develop and implement effective, fair and transparent conflict of interest management strategies to monitor and mitigate risk to the Compass Group.

The policy provides a process for the identification and management of a conflict of interest involving a director, Governance Committee member or Worker of the Compass Group.

Scope

This policy applies to all office locations of the Compass Group and its directors, Governance Committee members and Workers engaged to carry out business activities on behalf of the Compass Group.

Risk

Conflicts of interest are not wrong in themselves and can happen without anyone being at fault. However, it is vital that conflicts of interest are disclosed and managed effectively to ensure that directors, Governance Committee members and workers perform their duties in a fair and unbiased way. When not managed or properly mitigated, conflicts of interest have the potential to lead to a loss of public trust, may facilitate corrupt conduct and could result in criminal prosecution.

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Policy Statement

All actual, perceived and potential conflicts of interest must be disclosed by any Compass Group director, Governance Committee member or Worker concerned and registered as a standing notice of interest or material personal interest as relevant. Although a material personal interest will give rise to an actual conflict, the obligation to disclose extends to any potential or perceived conflict.

Each Compass Group director, Governance Committee member and Worker has a personal obligation to disclose any:

- a) personal interest which the Compass Group director, Governance Committee member or Worker believes is appropriate to disclose to avoid an actual, perceived or potential conflict of interest; and
- b) material personal interest a Compass Group director, Governance Committee member or Worker has or may have in a matter which relates to the affairs of the Compass Group.

In the case of a director, a member of a Governance Committee or a member of an advisory group, this personal obligation to disclose includes, but is not limited to, when that person’s personal interest is related to a matter that is being considered or discussed by the Parent Board, the Governance Committee or advisory group in a meeting of the Parent Board, Governance Committee or advisory group.

Policy Guidelines

The potential for conflict of interest exists in all aspects of Compass Group operations.

There should be no perception that any a director, Governance Committee member and Worker of the Compass Group has benefited by using their association with the Compass Group inappropriately or in any way contrary to the public interest.

In recognition of the Compass Group structure, and to manage the potential for conflicting duties as a result of multiple directorships within the Compass Group, a director of Subsidiary Company is taken to act in good faith and in the best interests of the Subsidiary Company if the director acts in good faith and in the best interests of the Parent Company and the obligation to act in the best interest of the Parent Company is expressly stated in the constitution of each Subsidiary Company.

Examples of Conflict of Interest

The following matters or personal interests may give rise to an actual or perceived conflict of interest:

- a) employment;
- b) any previous employment in which a director, Governance Committee member, advisory group member or Worker still has a financial or other interest;
- c) any other appointments (voluntary or otherwise), for example trusteeships, directorships, local authority membership, tribunals;

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- d) professional and organisational membership;
- e) membership of any special interest groups;
- f) gifts or hospitality offered to a director, Governance Committee member, advisory group member or Worker by external bodies in their capacity as a director, Governance Committee member, advisory group member or Worker and whether they were declined or accepted
- g) family connections where relevant, such as a spouse/partner working for a similar organisation
- h) using, or caring for a user, of the Compass Group’s services, and
- i) any contractual relationship between a director or a close relative and the Compass Group.

The Parent Board has resolved that no Compass Group director may accept a board appointment, sit on a board of, or be the Company Secretary of a company that is a specialist disability accommodation provider (**SDA**), a community housing provider (**CHP**) or a related body corporate (as defined in the *Corporations Act 2001* (Cth) of an SDA or CHP unless that SDA or a CHP that is a related body corporate of Compass.

Disclosure of a Conflict of Interest

Directors, Governance Committee Members or Advisory Group Members

Disclosure of an actual, perceived or potential conflict of interest by a director, Governance Committee member, or advisory group member may be made either:

- a) at the first practicable meeting of the board, Governance Committee or advisory group after becoming aware of the interest;
- b) if immediate disclosure is considered prudent to manage any potential risk to the Compass Group, to the other directors individually in writing and tabled at the next directors’ meeting; or
- c) in the annual standing notice of disclosure of interests.

At the time of making a disclosure, the director, Governance Committee member, advisory group member or Worker must provide comprehensive details of the:

- a) nature and extent of the interest; and
- b) connection between the interest declared to the affairs of the Compass Group.

Details of the disclosure by a Compass Group director, Governance Committee member or advisory group member must be recorded in the minutes of the meeting held following disclosure or in the minutes of the meeting at which disclosure is made.

The Company Secretary is responsible for lodging the declared conflict of interest through the Compass Group’s incident and event management software program in accordance with the current approved version of Compass Tickit Systems Incident and Event Reporting Procedures. Any declared conflicts of interest must be recorded in the corporate body’s *‘Register of Standing Conflicts of Interest’*.

The Company Secretary will send a letter to the director, Governance Committee member or advisory group member acknowledging the disclosure of the conflict of interest.

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A director may, at any time, consult with the Chair of the Parent Board or seek governance advice from the Company Secretary in order to determine the full nature and extent of their interest and whether it may be material. However, this does not affect of the director’s personal obligation to make a disclosure.

Because of the personal nature of this obligation and the personal consequences to a director with relation to conflicts of interest, the director should err on the side of caution and make the disclosure if a director has any doubt as to whether or not an interest may be material or otherwise require disclosure.

At the commencement of each meeting of the Parent Board, the board of a Subsidiary Company, a Governance Committee or advisory group, directors, Governance Committee members and advisory group members should be asked to disclose if they have any actual, perceived or potential conflict of interest to any items on the meeting agenda.

Following disclosure of an actual, potential or perceived conflict of interest by a director, Governance Committee member or advisory group member, the Parent Board, Subsidiary Board, Governance Committee or advisory group may pass a resolution that identifies the director, Governance Committee member or advisory group member, the nature and extent of the director’s, Governance Committee member’s or advisory group member’s interest (identifying the interest as an actual, potential or perceived conflict of interest) and how it relates to the affairs of the Compass Group. The Parent Board, Subsidiary Board, Governance Committee or advisory group may further resolve that:

- a) the director, Governance Committee member or advisory group member may nevertheless participate in the meeting and vote on the matter;
- b) any transactions that relate to the interest may proceed; and
- c) the director, Governance Committee member or advisory group member may retain benefits under the transaction despite the interest.

Workers

Disclosure of an actual, perceived or potential conflict of interest by a Worker may be made in writing to the Group Managing Director or their Group Executive Manager.

All employees and apprentices of the Compass Group are required to disclose and register the conflict of interest through the Compass Group’s incident and event management software program in accordance with the current approved version of Compass Tickit Systems Incident and Event Reporting Procedures.

Any contractors, sub-contractors, volunteers, outworkers, apprentices, work experience students, employees of a labour hire company and consultants engaged by the Compass Group must disclose a conflict of interest in writing to the employee responsible for engaging their services. This employee is responsible for registering the conflict of interest through Tickit.

All Workers will be sent a letter acknowledging the disclosure of the conflict of interest.

Following the disclosure of a conflict of interest by a Worker, the Group Chief Governance Officer must:

- a) record and acknowledge in writing receipt of the notice of disclosure of interest;

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- b) assess the disclosed interest to determine whether it is a conflict of interest; and
- c) where a conflict of interest is confirmed, ensure that the conflict of interest is recorded on the body corporate’s *‘Standing Conflicts of Interest Register’*; and
- d) develop and implement an appropriate strategy to manage the conflict of interest.

Leasehold programs

Directors, Governance Committee members, advisory group members and Workers are expressly prohibited from engaging with the Compass Group for the purposes of providing rental dwellings under the Community Housing Leasehold Program funded by the New South Wales Department of Family and Community Services and the Community Rental Scheme funded by Queensland Department of Housing and Public Works or any other similar program from time to time as determined by the Group Managing Director or Parent Board. This clause is not retrospective and any current lease agreements existing as at the date this clause is first adopted will be ended as soon as practicable.

Annual Standing Notice of Disclosure of Interests

Following the December meeting of the Parent Board each year, the Company Secretary is to provide each director, Governance Committee member and advisory group member with a form to update the previous disclosures and provide further standing notice of interests.

The completed forms are to be tabled at the first meeting of the Parent Board, Subsidiary Board, Governance Committee or advisory group in the annual Board, Committee and Advisory Group work calendar and used to update the *‘Standing Conflicts of Interest Register’*.

Without limiting disclosure, examples of interests that directors, Governance Committee members or advisory group members should include in their annual standing notice are:

- a) all other directorships of or executive positions that may have dealings with the Compass Group, including a directorship in a Compass Group company or a company in which Compass is joint venture partner;
- b) any other directorships (including a directorship in a Compass Group company or a company in which Compass is joint venture partner) and memberships that place demands on their time (that is, that could detract unreasonably from the time they have available to allocate to the affairs of the Compass Group);
- c) all substantial shareholdings in other companies with which the Compass Group transacts or may transact;
- d) property or other interest in a business that might have some interactions with the Compass Group
- e) any other interests in or memberships that may be relevant for example sporting clubs, community associations or political parties;
- f) any other interests that may be relevant for example a spouse’s or other associate’s interests; or
- g) any services that a director may be providing to a Compass Group company, whether under a Compass Group NED Short Form Service Contract or otherwise.

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In addition to providing an annual standing notice, each director and Governance Committee members must provide further oral or written notice of any changes to their standing notice of disclosure of interests as soon as practicable at a board, Governance Committee or advisory group meeting or to the other directors individually in writing and tabled at the next directors’ meeting. An example of when it may be appropriate for the disclosure to be made in writing and tabled at the next directors’ meeting is when the matter is likely to cause adverse or negative public attention.

Complaints or Grievances

Complaints relating to a conflict of interest will be managed in accordance with the Compass Complaint Handling Policy or relevant procedure but must consider the principles outlined in this policy.

A director, Governance Committee member, advisory group member or Worker may raise a grievance relating to a conflict of interest (Complainant). The grievance may be raised whether or not the conflict of interest has been disclosed and may relate to a personal conflict of interest (in which case the Complainant will also act as the Respondent) or a conflict of interest of another director, Governance Committee member, advisory group member or Worker (Respondent).

The grievance process will be managed in accordance with all relevant Compass policies and procedure, including the Compass Staff Grievance Policy and in the context of the following principles:

- a) the grievance must be handled within an appropriate time frame and will be treated sensitively and impartially, having due regard to procedural fairness which includes:
 - i. informing the Complainant and the Respondent of the procedure being followed and providing them with copies of relevant policies and guidelines;
 - ii. informing the Respondent of any allegation made against them relating to the conflict of interest, and allowing time for a response;
 - iii. providing the Respondent with the opportunity to state their case, providing an explanation or putting forward an explanation or a defence as appropriate;
 - iv. conducting a factual investigation of any allegation, interviewing all parties and considering all relevant information; and
 - v. acting fairly, impartially and without bias by considering all relevant information and any mitigating factors.
- b) it is expected that all parties involved will approach proceedings with a desire to resolve the grievance cooperatively and in good faith;
- c) individuals must not victimise or harass other parties involved in the matter;
- d) confidentiality must be strictly observed by all participants and at all stages of the grievance procedure; and
- e) the Respondent will be informed of the outcome of the investigation by the grievance investigator.

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Grievance Investigator

If the grievance relates to a director, Governance Committee member or advisory group member, it is the Chair of the Parent Board or the Company Secretary who is primarily responsible for managing the grievance procedure as the grievance investigator. The grievance investigator should advise the board, Governance Committee or advisory group as applicable that a grievance has been raised and the proposed process for investigating the matter.

If the grievance relates to a Worker, it is the Group Managing Director or the Group Chief Governance Officer who is primarily responsible for managing the grievance procedure as the grievance investigator.

Where it can be demonstrated that there is a conflict of interest or the potential for a perceived conflict of interest with the grievance investigator and the grievance under investigation:

- a) the grievance investigator should refer the matter immediately to an alternative investigator (where the grievance investigator is the Chair of the Parent Board, the alternative investigator must be the Deputy Chair of the Parent Board unless the board resolves otherwise) or the next level of management where the grievance is in respect of a Worker; or
- b) a complainant or respondent may request an alternate investigator.

Responsibilities

Directors, Governance Committee members, advisory group members and Workers

Each Compass Group director, Governance Committee member and Worker is personally responsible for assessing their personal interests and whether their interests materially conflict with, could be reasonably perceived to conflict with or have the potential to conflict with their duties or powers in regard to the affairs of the Compass Group.

Chair of the Parent Board

The Chair of the Parent Board and the Chair of any Subsidiary Board will ensure that each body corporate maintains its own *'Standing Conflicts of Interest Register'* to be presented as a standing agenda item at meetings of the Parent Board, Subsidiary Board, Governance Committee or advisory group.

Company Secretary

The Company Secretary is responsible for maintaining the central register system and will cross reference the central register with each bodies' corporate *'Standing Conflicts of Interest Register'*. The Company Secretary must ensure the current version of the *'Standing Conflicts of Interest Register'* is uploaded to the Diligent App 'Resource Centre' for access by the Compass Group directors at any time.

When preparing an agenda for a meeting of the Parent Board, a Subsidiary Board, a Governance Committee or advisory group, the Company Secretary in consultation with the relevant chair, must refer to the *'Standing Conflicts of Interest Register'* to determine if any directors, Governance Committee

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members or advisory group members may be conflicted in relation to business on the upcoming agenda and advise the relevant chair as to what pre-emptive actions should be taken.

If there is a matter on the agenda with which a director, Governance Committee member or advisory group member has a material personal interest and is prohibited from participating and voting on that matter, the Company Secretary must ensure that the director, Governance Committee member or advisory group member has access to a redacted meeting pack.

Group Managing Director

The Group Managing Director will be responsible for ensuring the development and maintenance of systems for recording, managing and monitoring Worker conflicts of interest.

Employees, volunteers and third-party contractors

All employees, volunteers and third-party representatives contracted to provide services for any entity within the Compass Group has an obligation to:

- a) familiarise themselves with and ensure they have a clear understanding of relevant policies;
- b) observe and implement such policies, and associated procedures in delivering services to Compass clients;
- c) inform clients of the impact of this policy on them and assist them to understand their rights and obligations, as required;
- d) identify issues that require amendment to this policy document and complete the relevant documentation to propose the policy amendments; and
- e) report breaches of this or any associated policies or procedures.

Group Executive Managers

The Group Chief Governance Officer is responsible for recording and acknowledging the notice of disclosure of interest of any Worker and assessing its nature and developing and implementing an appropriate strategy to manage the conflict.

The relevant Group Executive Manager is ultimately responsible for ensuring that:

- a) ensure all stakeholders within their area of responsibility are informed about relevant policies and procedures;
- b) ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures; and
- c) ensure appropriate processes and controls are implemented to enable breaches of approved policies and / or procedures to be reported and managed.

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Document Control

This document will be reviewed regularly, and revision will be made, if warranted. The relevant Group Chief Governance Officer is ultimately responsible for the control and review of policy documents. It is the responsibility of the Governance Unit to maintain and update the master policy document, policy directory and the policy register, administer the review and approval process and inform and distribute stakeholders when new and amended policies and procedures are approved.

Records

All records relevant to these procedures are to be maintained in a recognised Compass recordkeeping system.

Definitions

Term	Definition
Actual Conflict of Interest	Where there is a real conflict between the duties or powers of a director, Governance Committee member, advisory group member or Worker and existing private interests.
Compass	Compass Housing Services Co. Ltd
Compass Group	The corporate structure that includes Compass (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.
Conflict of Interest	A conflict of interest occurs when a director’s, Governance committee member’s, advisory group member’s or Worker’s personal interests’ conflict with their responsibility to act in the best interests of the Compass Group. Personal interests include direct interests as well as those of family, friends, or other organizations the director, Governance Committee member, advisory group member or Worker may be involved with or have an interest in (for example, as a shareholder). It also includes a conflict between a director’s, Governance Committee member’s or advisory group member’s duty to the Compass Group and another duty that the director, Governance Committee member or advisory group member has (for example, to another charity). A conflict of interest may be actual, potential or perceived and may be financial or non-financial. These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the Compass Group and must be managed accordingly.
Financial interests	Those that involve an actual, perceived or potential financial loss or gain.
Governance Committee	A committee established by resolution of and reporting to the Parent Board.

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Term	Definition
Material Personal Interests	<p>A conflict of interest is material if a reasonable independent person would take it into account in exercising judgment when making a decision. A material personal interest is a director’s, Governance Committee member’s, advisory group member’s or Worker’s personal, professional or business interests or the personal, professional or business interests of individuals or groups with whom a director, Governance Committee member, advisory group member or Worker is closely associated; that: are real and substantial, not theoretical, remote, contingent or otherwise insubstantial; and have, or appear to have, the capacity to influence the conduct of the staff member. Material personal interests may include:</p> <ul style="list-style-type: none"> • Financial Interests; • Non-financial interests.
Non-financial interests:	<p>Those that could, or could reasonably be perceived to, adversely affect the impartiality of the person having the interest, and includes;</p> <p>(i) interests arising from a personal or family relationship, or involvement in social, cultural or sporting activities; and</p> <p>(ii) other interests that may include a tendency toward favour, bias or prejudice resulting from personal involvement with any other person or group; and</p> <p>(iii) situations in which financial or other personal considerations may compromise, or may have the appearance of compromising, an academic researcher's professional judgment.</p>
Parent Board	The current directors of Compass.
Parent Company	Compass.
Perceived Conflict of Interest'	Where a third party could reasonably form the view that a director, Governance Committee member, advisory group member or Worker’s material personal interests could conflict with their duties or powers as a director, Governance Committee member, advisory group member or Worker of the Compass Group, whether or not this is in fact the case.
Potential Conflict of Interest	Where a director, Governance Committee member, advisory group member or Worker has material personal interests that could reasonably be perceived to conflict with their duties or powers as a director, employee or volunteer of Compass Housing Services.
Subsidiary Boards	The appointed board of directors of a Subsidiary Company.
Subsidiary Company	A company in which Compass owns all or at least a majority of the shares.

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Term	Definition
Worker	<p>Compass has adopted Safework definition of a 'worker' where the term is used in policy. The definition of a 'Worker' includes any person who carries out work for a 'person conducting a business or undertaking' (PCBU - includes employers).</p> <p>This term 'Worker' includes any person who works as an:</p> <ul style="list-style-type: none"> • employee • trainee • volunteer • outworker • apprentice • work experience student • contractor or sub sub-contractor • employees of a contractor or sub-contractor • employee of a labour hire company assigned to work for a NSW PCBU.¹

Document Administration

Responsible Officer	Group Managing Director or delegate
Approval Authority	Compass Parent Board of Directors
Document Administrator	Governance and Compliance Business Unit
Administrator email	companydocuments@compasshousing.org

Related Documents

Document Type	Document Name
Policies	Code of Conduct Delegations Policy Fraud and Corruption Policy Risk Management and Risk Appetite Policy Other policies and procedures as may be relevant from time to time – refer Delegations Policy annexure 3 for list of approved policies and procedures.
Procedures	Conflict of Interest Procedures
Forms	Conflict of Interest Register

¹ <http://www.workcover.nsw.gov.au/newlegislation2012/Employeesandworkers/Pages/default.aspx>

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Other	Compass Housing Services Constitution Compass Group Charter Compass Governance Committees Terms of Reference Compass Fraud and Corruption Control Plan Compass Risk Management Plan
Supporting Legislation / Standards	Corporation Act 2001 (Cwlth) Australian Charities and Not for Profit Commission Act 2012 (Cwth) Companies Act 1993 (N) Charities Act 2005 (NZ) And supporting amendments and regulations

Amendment History			
Version	Date	Status and Changes	Author
V1.0	2008-06-02	Policy created	G Budworth – Chief Executive Officer
V2.0	2010-06-30	Scheduled review	G Budworth – Chief Executive Officer
V3.0	2012-06-13	Scheduled review	G Budworth – Chief Executive Officer
V4.0	2013-09-10	Submitted for Board Approval Minor Amendment: Review and update of Conflict of Interest Policy and Procedures	G Budworth – Chief Executive Officer & Executive Director
V5.0	2015-09-10	Scheduled review	B Wong – Policy & Quality Administrator
V6.0	2017-06-08	Scheduled review and amendment to align with Group structure	Julie Barnett, Compass Executive Manager Governance, Risk and Compliance
V7.0	2018-04-23	Review to reflect a revised approach to disclose and record standing notices of interest.	Julie Barnett, Compass Executive Manager Governance, Risk and Compliance and Stephanie Campbell, company secretary
V8.0	2018-12-17	Review to reflect training from Hall&Wilcox on duties to avoid conflict of interests Approved at the Compass Parent Board meeting of 17 December 2018	Stephanie Campbell, Company Secretary, Julie Barnett, Group Chief Governance Officer and Kwesi Addo, Chair of Parent Board

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