



# Policy 122

122 Conflict of Interest			
Applies to	Board Members Staff Teachers Club Management Volunteers In Pool Volunteers	Date Approved 21 June 2023	
Responsibility	CEO	Next Review Due	12/2025

## POLICY STATEMENT

Rainbow Club is committed to transparency and fairness in all its operations and to managing any conflict of interest in an open and transparent manner.

## POLICY APPLIES TO

Board members, CEO, Staff, Volunteer Committee Members and Teachers and in pool volunteers

## DEFINITIONS

### **Conflict of Interest**

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of Rainbow Club. Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder).

It includes a conflict between a Board member or Staff member's duty to Rainbow Club and another duty that the board member or staff member may have. Staff Members may have conflicts if they have a family member involved in Rainbow Club as either a participant receiving service or a teacher delivering a service.

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 Rainbow Club. Therefore, these situations must be managed accordingly.

### **Inside information**

Inside Information is information not generally available to the public.

## PROCEDURES

### Board Members

- A register of interest is maintained and regularly updated which identifies and discloses Board Members' interests.
- The Chair calls for any conflicts of interest relating matters on the agenda at the beginning of every Board meeting.

### Staff and Teachers

- Staff and Teachers must not take advantage of their position to gain, directly or indirectly, a personal benefit, or a benefit for any associated person (e.g. a family member or another organisation). This includes the use of 'inside information' to gain advantage.
- The personal interests of staff and teachers, and those of any associated persons, must not be allowed to take precedence over those of Rainbow Club generally.
- Staff should seek to avoid conflicts of interest wherever possible. Full and prior disclosure of any conflict, potential conflict, or the appearance of a potential conflict must be made to the CEO. Once the conflict has been declared, the CEO must decide what action to take to manage the conflict. Conflicts of Interest must be recorded and monitored in the Rainbow Club Declaration of Interest Register.
- Staff will not (by act or omission) constrain, influence or direct decision-making by a person with a disability and/or their family so as to limit that person's access to information, opportunities, and choice and control.
- Rainbow Club staff and teachers must not
  - Use their position at Rainbow Club to gain advantage for themselves or a family member (this may include preference for a family member on a Rainbow Club schedule or employment or supervision of family members who teach at a Rainbow Club)
  - Accept any offer of money, gifts, services or benefits that would cause them to act in a manner contrary to the interests of its members.

### Volunteer Committee Members

in recognition of their volunteer contribution to their local Rainbow Club, Volunteer Committee Members get priority with membership at their local club and preference regarding the time and teacher scheduled for their child.

### Actions to manage actual or perceived conflicts

In the event of a conflict of interest, Rainbow Club will ensure that there are no impediments to a member's right to services from Rainbow Club.

The CEO will investigate, document and report to the Board on any conflicts that might arise and how the conflict has been handled.

### **Review of Declarations**

Declarations of Interest register will be reviewed and updated annually following the Annual General Meeting. The review will be carried out by the CEO or person delegated by the CEO to carry out this review.

