



Conflict of interest policy

1. Purpose

The purpose of this policy is to staff of Sprout Psychology Centre to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of Sprout Psychology Centre and manage risk.

2. Objective

The Sprout Psychology Centre management aims to ensure that staff are aware of their obligation to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of Sprout Psychology Centre.

3. Scope

This policy applies to all staff of Sprout Psychology Centre including Principal Psychologist, Practice Manager, Admin staff, Provisional Psychologist and Behaviour Support Clinicians.

4. Definition of conflicts of interests

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of Sprout Psychology Centre.

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 also includes a conflict between a staff members duty to Sprout Psychology Centre and another duty that the staff 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 Sprout Psychology Centre. Therefore these situations must be managed accordingly.

5. Policy

This policy has been developed to address conflicts of interest affecting Sprout Psychology Centre.

Conflict of interest are common, and they do not need to present a problem to Sprout Psychology Centre as long as they are openly and effectively managed.

It is the policy of Sprout Psychology Centre, as well as a responsibility of the staff, that ethical, legal, financial or other conflicts of interest be avoided and that any such



conflicts (where they do arise) do not conflict with the obligations to Sprout Psychology Centre.

Sprout Psychology Centre will manage conflicts of interest by requiring staff members to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches.

5.1. Responsibility of management

Sprout Psychology management is responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest across Sprout Psychology Centre
- monitoring compliance with this policy, and
- reviewing this policy on an annual basis to ensure that the policy is operating effectively.

Sprout Psychology Centre must ensure that its staff members are aware of the ACNC governance standards, particularly governance standard 5, and that they disclose any actual or perceived material conflicts of interests as required by governance standard 5.

Sprout Psychology Centre management ensure that all staff are aware and are adhering to the Australian Psychological Society (APS) Code of ethics in particular General Principal C: integrity, C.3 Conflict of Interest.

5.2. Identification and disclosure of conflicts of interest

Once an actual, potential or perceived conflict of interest is identified, it must be entered into Sprout Psychology Centre's register of interests, as well as being raised in supervision.

Where every board member shares a conflict, the board should refer to ACNC Governance Standard 5 to ensure that proper disclosure occurs.

The register of interests must be maintained by the practice manager. The register must record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).



5.3 Confidentiality of disclosures

The practice manager and Principal Psychologist will have access to the information disclosed in the register as well as any supervising Psychologist.

6. Action required to manage conflicts of interest

6.1. Conflicts of interest of staff members

Once the conflict of interest has been appropriately disclosed, management:

- will discuss with the staff member in supervision
- vote on the matter with management team (this is a minimum),
- participate in any debate (as required)

In exceptional circumstances, such as where a conflict involves the management team:

- will discuss with the management team
- other members of management to make a decision re moving forward with the conflict (excluding the member of management involved in the conflict)
- participate in any debate (as required)

6.2. What should be considered when deciding what action to take

In deciding what approach to take, the board will consider:

- whether the conflict needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- alternative options to avoid the conflict
- the charity's objects and resources, and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the charity.

The approval of any action requires the agreement of the Principal Psychologist.

The action and result of the voting will be recorded in the register of interests.

7. Compliance with this policy

If management has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances.

If it is found that this person has failed to disclose a conflict of interest, the management may take action against them. This may include seeking to terminate their relationship with the client and Sprout Psychology Centre.



If a person suspects that a member of management has failed to disclose a conflict of interest, they must:

- discuss with the person in question
- or another person responsible for maintaining the register of interests.