

The Skillinvest Group

Staff Conflict of Interest Policy

Approved: **August 2010**



Staff Conflict of Interest Policy

The Skillinvest Group, including WORKCO Limited, LINK Employment and Training, Longerenong College and EastVic Workforce are providers of many services in the employment and training field to achieve our core purpose. In

Providing a wide range of services the potential for conflict of interest exists.

This policy is to identify areas of potential conflict of interest in the organisation and manage any actual or potential conflicts of interests identified. The management of these identified conflicts of interest the organisation demonstrates to our staff, customers and the community we have an ethical approach to business and ensures there is no adverse effect on any stakeholders.

AREAS of POTENTIAL CONFLICT of INTEREST

- Where a staff member of WORKCO staff or his/her family/partner, through either personal or business interest, stands to gain financially from any business dealing, program or service provided by The Skillinvest Group.
- Where a staff member stands to gain directly or indirectly from any business dealing, service or intellectual property provided by The Skillinvest Group to a competitor of any other business interest of that staff member or his/her immediate family/partner.
- Where a staff member stands to gain professionally or personally from any inside information, and that knowledge is used for personal or professional advantage.
- Where a division/program of The Skillinvest Group refers flow on business to another Skillinvest Group division/program and that division/program is not in an appropriate position to deliver the flow on service to meet the needs of the client.
- Where a division/program of The Skillinvest Group does not follow contract guidelines when dealing with another Skillinvest Group

STRATEGIES to MANAGE POTENTIAL CONFLICTS

All of The Skillinvest Group's different divisions/programs report as separate entities, with independent responsibilities, objectives and reporting structures. Any conflict of interest would need to be accepted and approved by several individual decision makers before it impacts any stakeholder.

It is a company requirement that any business or personal matter which is, or could be, a conflict of interest involving the individual and or his/her role, must be declared and registered in the Register of Interest, kept by the Chief Executive Officer.

All such entries in the Register of Interest shall be presented to the Board and minuted at the first board meeting following entry in the records.

A staff member aware of an actual or potential conflict of interest involving another staff member, has a responsibility to bring this to the notice of the staff member concerned for declaration. If the staff member concerned fails to declare the situation, it is the responsibility of the other staff member to advise company management of the situation.

CONFLICT of INTEREST HANDLING PROCESS

Where an actual or potential conflict of interest is declared or perceived, the General Manager will investigate the matter to identify the nature and scope of the conflict and to determine a course of action to be taken to manage the matter. The Chief Executive Officer will be informed of the matter and if identified as an actual or potential conflict, then it will be recorded in the Register of Interest and presented to the board. Where the declaration of potential conflict of interest involves the General Manager, then the Chief Executive Officer will be notified and will administer this process. Where the declaration of potential conflict of interest involves the Chief Executive Officer, then the Chairman of the Board of Directors will be notified and will administer this process.

If it is found that a conflict of interest existed during the provision of a service to a client that adversely affects, or can be seen to adversely affect the client, then the General Manager shall investigate the situation and take whatever remedial action is necessary to overcome the situation from the client's perspective. The General Manager shall also discuss the incident with those involved and take appropriate action to prevent recurrence.

COMPLAINTS HANDLING PROCESS

This process is documented in each company's Quality Manual and is handled under the provisions of Quality Management Procedure QMP-006 Issues, Problems and Complaints for The Skillinvest Group's quality manual for their provisions.

If not adhered to by all staff, this policy may be subject to disciplinary proceedings.



Staff Conflict of Interest Register

Please list any financial interests or assets, or areas, which may arise as a conflict of interest to your duties as a Staff Member of the Skillinvest Group.

Example:

I am a partner in Grundig Holdings, a wholesale rope company, which employs WORKCO Limited Apprentices and Trainees.

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2.
3.
4.
5.
6.
7.
8.
9.
10.
11.
12.

NAME: _____

SIGNATURE: _____

DATE: _____

If your interests change, please notify the Executive Assistant to update your register.