

Policy Name	Interests, Conflicts, Gifts and Hospitality Policy		
Approver	Board	Owner	Society Secretary & Chief Governance Officer
		Lead	Deputy Governance Officer
Version	Date of Approval	Summary of changes made	Next review due
1.0	25 August 2023	Amalgamates the Conflict of Interest Policy (for employees and members) and the Gifts, Benefits and Hospitality Policy into a single policy.	
1.1		Minor Revisions to update position titles at 26 Feb 2024	2026

1 Purpose

- (a) Australian Red Cross places great importance on the identification, recording and reporting of conflicts, interests, and duties to maintain a high degree of confidence with its Stakeholders and ensure compliance with its legal and contractual obligations.
- (b) This policy outlines the approach Australian Red Cross takes to identify, evaluate, manage, and monitor conflicts, interests, duties, gifts, and hospitality.

2 Scope and Audience

- (a) This policy applies to all Australian Red Cross People, including all Responsible People, and contractors of Australian Red Cross.
- (b) This policy does not apply to employees or contractors working or engaged solely for Lifeblood.

3 Policy

3.1 Conflicts, Duties, and Interests



(a) Identify:

- (i) All Australian Red Cross People, and contractors of Australian Red Cross must identify:
 - (A) Actual Conflicts currently held or held within the last five years;
 - (B) Perceived Conflicts (i.e., circumstances where it might appear to others that there is a Conflict - regardless of whether there is an actual Conflict or not) currently held or held within the last five years;
 - (C) Potential Conflicts (i.e., circumstances where it is foreseeable that a Conflict may arise in future) currently held or held within the last five years;
 - (D) Positions (including any nomination for positions) in political parties currently held or held within the last five years; and
 - (E) Positions that may be regarded as a Government Officials/Officials of International Organisations currently held.
- (ii) Additionally, all Responsible People must identify any:
 - (A) Interest and Duty currently held or held within the last five years.
 - (B) Positions that may be regarded as a Government Official held in the last five years.
- (b) All Australian Red Cross People, Responsible People, and contractors of Australian Red Cross must **evaluate** any Conflict, Duty, Interest, or position(s) held as identified under 3.1(a) on its own merits, including considering:
 - (i) The nature and type of Conflict, Duty, Interest, position(s) held, and parties involved.
 - (ii) The circumstances which have given rise or might give rise to the Conflict, Duty, Interest.
 - (iii) The effect and impact of the Conflict, Duty, Interest, or position(s) held on Australian Red Cross and its stakeholders.
- (c) All Australian Red Cross People, Responsible People, and contractors of Australian Red Cross must:
 - (i) Promptly **report** any Conflict, Duty, Interest, or position(s) held as identified under 3.1(a) to the line manager, supervisor or point of contact (for members being Divisional Advisory Board Chair, Branch President or the Community Mobilisation Team (as appropriate)), who will work with them to develop a proposed treatment plan that sets out the appropriate steps to control or avoid any

Conflict, Duty, Interest, or position(s) held so that there is no impact to Australian Red Cross or its stakeholders.

Note: Any Conflict, Duty, Interest, or position(s) held that go against the Fundamental Principles, are illegal or may cause serious impacts to Australian Red Cross or its stakeholders must be avoided in the treatment plan.

- (ii) As soon as practicable make a report in the Interests Register of any Conflict, Duty, Interest, or position(s) held as identified under 3.1(a) and propose a treatment plan as developed with the line manager, supervisor or point of contact under 3.1(c)(i).

Note: Email governance@redcross.org.au to access or update the Interests Register.

- (d) **Treatment Plan:** Proposed treatment plans for any Conflict, Duty, Interest, or position(s) held as identified under 3.1(a) shall be approved as set out below on advice from the Society Secretary & Chief Governance Officer (or their delegate):

For reports made by:	The treatment plan will be approved by:
Board and Committee Members	Board
CEO	President
All other people, including Australian Red Cross People and contractors of Australian Red Cross	CEO (or their delegate)

3.2 Gifts and Hospitality

- (a) Australian Red Cross People must not:
- (i) Seek Gifts or Hospitality for themselves or Related Parties.
 - (ii) Accept Gifts or Hospitality that create or may create a Conflict.
 - (iii) Be influenced or alter decision making processes or objectivity by the receipt of Gifts or Hospitality.
 - (iv) Give to non-Australian Red Cross People or accept from non-Australian Red Cross People cash or cash-convertible gifts (e.g., gift cards).
 - (v) Give (or arrange another party to give) any Gifts or Hospitality on behalf of Australian Red Cross not approved by the President or CEO (or their delegate) to another party that has authority to give or influence the giving of a contract to Australian Red Cross.
- (b) Australian Red Cross People (including Responsible People) must (within seven days) record in the Interests Register any Gift or Hospitality given to a party or received from a party in any financial year where the value is equal to or greater than AUD300 (whether given or received on one occasion or across multiple occasions in the financial year).
- (c) Australian Red Cross People must not accept Gifts or Hospitality from a single party in any financial year where the value exceeds AUD600 (or such lesser amount permitted under local laws) without prior approval of the President or CEO (or their delegate).

Note: Where the value is unknown, a best estimate of the value should be given in Australian Dollars.

3.3 Annual Attestation

Australian Red Cross may periodically require Australian Red Cross People (including Responsible People who have retired or resigned in the current or previous financial year) to confirm compliance with their obligations in this policy.

3.4 Oversight and reporting

- (a) Periodic reports of any Conflict, Interest, Duty, Gift or Hospitality disclosed by Australian Red Cross People (including Responsible People) shall be provided to the CEO, Board, Committees, and auditors as needed.
- (b) Details of any Conflict, Interest, position(s) held, Duty, Gift or Hospitality may be used and disclosed to others in connection with complying with legal or contractual requirements, or to reduce risks (e.g., allowing procurement to ensure that Australian Red Cross People who have a Conflict, Duty, or Interest are not involved in negotiating contracts with those parties).

3.5 Record Keeping

Any Conflict, Duty, Interest, Gift or Hospitality recorded in the Interests Register and any action taken, or correspondence sent in connection with them shall be retained for a period of not less than seven years (unless any law requires such records to be retained for a longer or shorter period of time).

3.6 Non-compliance

- (a) Failure to comply with this policy may have serious reputational consequences for Australian Red Cross.
- (b) Non-compliance with this policy, whether deliberately or through negligence could result in further training, disciplinary or other legal consequences including termination of employment, volunteering assignment or membership.
- (c) The Audit and Risk Committee shall be responsible for overseeing and reporting to the Board on compliance with this policy.

3.7 Board, Committee and Divisional Advisory Board members

- (a) Board, Committee and Divisional Advisory Board members must read this policy conjunction with the Governance Conflicts of Interest Policy.
- (b) The Governance Conflicts of Interest Policy (where applicable) shall prevail to the extent of any inconsistency with this policy.

4 Other
4.1 Definitions

Term	Definition
Australian Red Cross	Australian Red Cross Society
Australian Red Cross People	As the context requires, all employees, volunteers, and members of Australian Red Cross
Board	The Board of Australian Red Cross as established in accordance with Rule 10
Close Relative	An individual's family member who may be expected to influence, or be influenced by, that individual in their dealings with Australian Red Cross, including: <ul style="list-style-type: none"> (a) A person in a close personal relationship with the individual, such as: <ul style="list-style-type: none"> (i) A spouse or partner, including a de facto partner. (ii) A financially dependent person. (iii) Any person with whom there is currently, or in a relevant period has been, an intimate relationship. (b) The individual's children, dependants, and grandchildren. (c) Children, dependants, and grandchildren of a person in a close personal relationship with the individual. (d) The individual's immediate family, including a parent or sibling.
Committee	Any committee established by the Board under 'Terms of Reference'
Conflict	Where a reasonable person knowing the facts, considers that an individual or their Related Parties position is inconsistent with, diverges from, or compete with some or all the interests of Australian Red Cross or otherwise has the potential to improperly influence that individual or their Related Parties Note: <i>The conflict may be an actual, perceived (i.e., circumstances where it might appear to others that there is a Conflict), or potential (i.e., circumstances where it is foreseeable that a Conflict may arise in future)</i>
Divisional Advisory Board	The body as established in accordance with Rule 17.4 to provide advice in Divisions pursuant to the Divisional Regulations
Divisional Regulations	The same meaning as given to that term in the Rules

Term	Definition
Duty	<p>Any duty owed by a Responsible Person to a beneficiary or any other person that is determined to be relevant having regard to:</p> <ul style="list-style-type: none"> (a) The nature and type of the other duty held by the Responsible Person (i.e., director of another entity); (b) Whether the duty to Stakeholders and Australian Red Cross has the potential to be adversely impacted by the other duty held by the Responsible Person; (c) Whether priority has been given to the duties to Australian Red Cross and Stakeholders despite the other duty held by the Responsible Person; (d) Whether the duties to Stakeholders are being met despite the other duty held by the Responsible Person; and (e) Does the other duty held by the Responsible Person cause a Conflict
Executive Leadership Team	Any person appointed as an 'Executive' by the CEO
Fundamental Principles	The seven Fundamental Principles (Humanity, Impartiality, Neutrality, Independence, Voluntary Service, Unity and Universality) sum up the global Movement's ethics and are at the core of its approach to helping people in all its activities at all times
Gift	<p>Items of value given which could be seen to be of benefit to the recipient without paying for them (e.g., event tickets, electronics, hampers, and alcohol), where given in connection with a role at Australian Red Cross</p> <p>Note: Gifts do not include corporate gifts such as branded pens, and stationery</p>
Government Officials / Officials of International Organisations	<p>Any of the following:</p> <ul style="list-style-type: none"> (a) An appointed or elected official (b) Candidate for public office (c) Employees of a government entity (d) Board members of a public institution (including schools, military, colleges, or universities) (e) Military personnel, including both permanent and Reserve Forces (f) A member of a royal family (g) Employees or a regulatory organisation for the financial services industry (h) Employees or officials of an international public organisation (supranational) such as the United Nations, European Union institutions and Bodies, The World Bank Group (i) Direct employees or elected officials of the ICRC or IFRC
Hospitality	<p>The services a host may provide a guest such as meals, travel, accommodation, and entertainment at conferences, social or sporting events, where given in connection with a role at Australian Red Cross (but not where in connection with delivering Australian Red Cross programs, such as travel and accommodation funded by DFAT)</p> <p>Note: Hospitality does not include meals, entertainment, etc. when attending industry or work-related seminars, conferences, and briefings</p>
Interest	<p>Any interest, gift, emolument, or benefit, whether monetary or non-monetary, directly, or indirectly held by a Responsible Person that is determined to be relevant having regard to whether:</p> <ul style="list-style-type: none"> (a) The interests of Australian Red Cross and Stakeholders are adversely affected by the interest held by the Responsible Person; or (b) Priority has been given to the interests' held by the Responsible Person over the interests of Australian Red Cross and Stakeholders
Interests Register	Register maintained by the Legal & Governance team or Risk & Compliance team where details of Conflicts, Duties, Hospitality, Interests, and Gifts disclosed are recorded, as well as any actions taken in connections with them

Term	Definition
Lifeblood	Australian Red Cross Lifeblood, the trading name of Australian Red Cross Blood Service established under Rule 19.1
Related Parties	(a) Any Close Relative (b) Any entity in which the individual has an Interest
Responsible Person	(a) All Board and Committee members (b) All members of the Executive Leadership Team
Rule(s)	The rules of Australian Red Cross dated 2 August 2013 (as amended or substituted from time to time)
Stakeholders	Beneficiaries, clients, other Australian Red Cross People, the community, governments, donors, and partners of Australian Red Cross

4.2 Related Documents

- (a) Code of Conduct (Our Code).
- (b) Fraud Prevention and Control Policy.
- (c) Interests Register (which records details of Conflicts, Duties, Hospitality, Interests, and Gifts disclosed).
- (d) Governance Conflicts of Interest Policy

4.3 Related legislation / standards

- (a) ACNC Governance Standard 5.
- (b) *Corporations Act 2001* (Cth).