Conflict of interest strategies for organisations

Checklist

## Policy – with risk mitigation strategies

[ ]  Is a suitable conflict of interest policy in place for employees?

[ ]  Does it include risk mitigation strategies that will enable your organisation to manage conflicts of interest proportionate to the risk and circumstances of the conflict?

[ ]  Is the policy supported by suitable systems and processes?

## High risk areas

[ ]  Has the organisation identified its areas of high risk for conflict of interest?

[ ]  Have employees been advised of these areas through the organisation’s policy or guidance?

[ ]  Is extra support in place in these areas? For example, effective control measures for tendering processes?

## Culture of integrity

[ ]  Does the organisation take suitable steps to embed a culture of integrity?

[ ]  Do executives in the organisation model a culture of integrity?

[ ]  Do employees feel supported to seek advice and comfortable in asking questions about conflicts of interest?

[ ]  Do employees feel supported and protected to ‘speak up’ about possible issues of undeclared or unmanaged conflicts affecting the organisation?

[ ]  Are employees who speak up actively supported and protected?

[ ]  Are employees aware that they can go directly to the Independent Broad-based Anti-corruption Commission (IBAC) or the Victorian Ombudsman with allegations about corrupt or improper conduct?

## Preventative strategies

[ ]  Are preventative strategies in place to reduce the likelihood of a conflict of interest arising in the first place?

[ ]  For example: are external stakeholders such as suppliers and contractors aware of the organisation’s stance and policy on conflict of interest?

## Communication strategy

[ ]  Is there a communication strategy for raising awareness of, and compliance with, conflict of interest obligations?

## Employee awareness and learning opportunities

[ ]  Is conflict of interest training and education part of the induction process for all employees?

[ ]  Are there regular suitable awareness raising and learning opportunities for employees in relation to conflict of interest?

[ ]  Are your organisation’s conflict of interest policy, forms, processes and guidance easily accessible to employees (including on the intranet)?

[ ]  Are your employees advised and aware of how to find them?

[ ]  Are there clear links to the Victorian Public Sector Commission’s conflict of interest guidance on your organisation’s Conflict of interest intranet page and other suitable locations?

[ ]  Are conflict of interest discussions a regular feature in team meetings?

[ ]  Are updates to policy and procedure communicated to all employees?

## Targeted awareness and education

[ ]  Does targeted awareness raising and education occur in high risk areas of conflict of interest, such as for members of recruitment panels and procurement panels?

[ ]  Does targeted awareness raising and education occur for executives and for managers with direct reports?

## Alleged breaches

[ ]  Does your organisation deal with alleged breaches of its policy in a fair, proportionate and reasonable manner, taking a [graduated approach](https://vpsc.vic.gov.au/ethics-behaviours-culture/conflict-of-interest/strategies-and-checklist-for-organisations/alleged-breaches/)?

## Monitoring and evaluation

[ ]  Is there regular monitoring and evaluation of the policy and related processes?

[ ]  Are there regular reviews and updating of the organisation’s preventive and management strategies, including its guidance materials?

[ ]  Does the Audit and Risk Committee receive the required reports and does this result in systemic improvements where required?