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?