Anglican Diocese of Adelaide

Subject:	Conflict of Interest Policy		
Body adopting policy:	Diocesan Council	**Date of adoption or last review:**	10 December 2025
Related Documents:	Register of Interests	**Review schedule:**	5 Years

1. Purpose

The purpose of this policy is to help members of Councils, Boards and Committees of the Anglican Diocese of Adelaide (Office Holders) to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of the Anglican Diocese of Adelaide and manage risk.

2. Objective

The Diocese aims to ensure that Office Holders are aware of their obligation to disclose any conflicts of interest they may have, and to ensure they effectively manage those conflicts as representatives of the Anglican Diocese of Adelaide.

3. Scope

This policy applies to all Office Holders in the Diocese including but not limited to members of Diocesan Council and its committees (PFRC, DRAC, AFM and its committees), St Barnabas College Council and its committees, Professional Standards Committee, Episcopal Standards Committee as well as to Key Management Personnel (KMP).

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 the organisation.

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 Diocesan Council member's duty to the Anglican Diocese of Adelaide and another duty that the Diocesan Council member has (for example, to a 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 the Anglican Diocese of Adelaide.

Therefore, these situations must be managed accordingly.

5. Policy

It is the policy of the Anglican Diocese of Adelaide, as well as all Office Holders that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with obligations to the Anglican Diocese of Adelaide.

5.1 ACNC Governance Standards

The Anglican Diocese of Adelaide must ensure that its Diocesan Council members are aware of the ACNC governance standards, particularly governance standard 5 (https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/5-duties-responsible-people), and that they disclose any actual or perceived material conflicts of interests as required by governance standard 5. Where every other Diocesan Council member shares a conflict, the Diocesan Council should refer to ACNC Governance Standard 5 to ensure that proper disclosure occurs.

5.2 Identification and disclosure of relevant interests

Once an actual, potential or perceived conflict of interest is identified, it is considered a relevant interest and must be entered into the Anglican Diocese of Adelaide's Register Of Interests, as well as being raised with the relevant Board or Committee of which the Office Holder is a member.

All Office Holders and Key Management Personnel are required to disclose all relevant interests on the Register of Interests.

5.3 Confidentiality of disclosures

The complete Register of Interests will be maintained confidentially by the Secretary of Synod, be tabled at Diocesan Council annually and be made available to the Diocesan Bishop and on request to The Professional Standards Committee and the Episcopal Standards Committee.

The section of the Register of Interests relevant to each Council, Board, Committee or body shall be tabled with that body at least once annually.

6. Responsibilities

6.1. The Diocesan Council

The Diocesan Council is responsible for:

1. establishing a system for identifying, disclosing and managing conflicts of interest across the Anglican Diocese of Adelaide;
2. monitoring compliance with this policy; and

3. reviewing this policy every 5 years to ensure that the policy is operating effectively.

6.2 Secretary of Synod

The Secretary of Synod is responsible for:

1. Implementing this policy with appropriate administrative procedures
2. Maintaining a Register Of Interests for all Office Holders
3. Providing a copy of the Register Of Interests to Diocesan Council at least annually
4. Referring alleged breaches of this policy to the Professional Standards Committee

6.3 Office Holders

Office Holders are responsible for:

1. avoiding conflicts of interest where possible;
2. identifying and disclosing any conflicts of interest;
3. Entering all relevant interests onto the Register Of Interests and updating them within one month of any change in interests;
4. carefully manage any conflicts of interest; and
5. follow this policy and respond to any actual or perceived breaches.

7. Action required to manage conflicts of interest

7.1. Conflicts of interest of Office Holders

Once the conflict of interest has been appropriately disclosed, the relevant body (excluding the Office Holder who has made the disclosure, as well as any other conflicted Office Holder) must decide whether or not those conflicted Office Holders should or should not:

- vote on the matter (this is a minimum),
- participate in any debate, or
- be present in the room during the debate and the voting.

In exceptional circumstances, such as where a conflict is very significant or likely to prevent an Office Holder from regularly participating in discussions, the relevant body should consider the viability of the Office Holder's ongoing membership.

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

In deciding what approach to take, the relevant body will consider:

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

The approval of any action requires the agreement of at least a simple majority of the relevant body (excluding any conflicted Office Holder) who are present and voting at the meeting.

The action and result of the voting will be recorded in the minutes of the meeting.

8. Compliance with this policy

If the relevant body 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 Diocesan Council may take action against them. This may include referral to the Professional Standards Committee, seeking to terminate their relationship with the Diocese (or any other sanctions).

If a person suspects that an Office Holder has failed to disclose a conflict of interest, they must notify the Diocesan Bishop or the Secretary of Synod or the Professional Standards Director immediately.

9. Review

This policy is to be reviewed every five years