

# Conflicts of Interest Policy

## Purpose

The purpose of this policy is to ensure that conflicts of interest are managed so that they do not negatively impact upon the Association.

## Policy statement

Conflicts of interest are any situation where one individual or organisation has an interest in two or more individuals or organisations which leads them to act either favourably or negatively to one of the individuals or organisations.

Conflicts of interest can create many negative impacts on the Association, its business partners and the wider public. As a not-for-profit professional accountancy association, the Association seeks to fairly manage all conflicts of interest. All conflicts of interest should be identified, recorded and control measures should be implemented to reduce the negative impact(s) of the conflicts.

## Scope of this policy

All CPAA employees, directors, branch officials, contractors, trainees, interns, official agents, consultants, agency staff, fixed term staff and temporary staff (from here within this policy referred to as employees) are bound by this policy.

Within the context of this policy a third party is any individual or organisation who you encounter while working for the CPAA.

This policy covers the following areas:

- Identifying and recording conflicts of interest
- Developing and implementing control measures

Nothing within this policy document overrides the relevant Articles which address conflicts of interests as they relate to the Association's Council.

## Identifying and recording conflicts of interest

It is the responsibility of all CPAA employees to disclose any conflicts of interest they have to the Operations Manager, who will record these in the 'CPAA Conflicts of Interest Log'. To knowingly not disclose a conflict of interest can result in a disciplinary, loss of office or termination of employment.

If the Operations Manager believes that there is a conflict of interest which has not been disclosed they will investigate. If an undisclosed conflict of interest is found the employee could face disciplinary proceedings, loss of office or termination of employment.

### **Developing and implementing control measures**

The Operations Manager is responsible for developing and implementing control measures to minimise, and where possible eliminate any negative impacts emerging from any conflicts of interest. These control measures are recorded in the 'CPAA Conflicts of Interest Log'.

### **Raising concerns**

If you have any concerns, or are unsure if an activity breaches this policy, you should inform your line manager or the Operations Manager.

### **Protection**

The Association supports any employee who raises a concern in relation to this policy, even if the concern turns out to be a mistake. Under Association guidelines you are protected from any negative repercussions related to raising a concern under this policy (this includes threats, discrimination, disciplinary action etc.). If you have raised a concern relating to this policy and feel as though you have been the victim of negative repercussions as a consequence you should contact the Operations Manager or use the Association's official grievance procedures.

### **Training and communication**

All Association employees receive training on this policy, both upon induction and at regular intervals during their employment.

### **Responsibility**

Ultimately Council hold responsibility for this policy. On a day-to-day basis, the Operations Manager holds responsibility for this policy.

### **Monitoring and review**

Council keep this policy under constant review to ensure its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

Employees are invited to comment on this policy and suggest improvements, these comments and suggestions should be addressed to the Operations Manager.

This policy does not form part of an employee's contract of employment and may be amended at any time. All employees will be notified of any amendments to this policy.