

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.	
2.0	20 June 2025	[Effective 1 July 2025] Policy updated to reflect Governance Reforms & consolidate with the previous Governance Conflicts of Interest Policy.	2028

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 people in Governance Leadership Roles, Responsible Employees, and contractors of Australian Red Cross.
- (b) This policy does not apply to employees or contractors working or engaged solely for Australian Red Cross Lifeblood.

3 Policy

3.1 Conflicts, Duties, and Interests



(a) Step 1: 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 an Elected Government Representative or Public Entity Official currently held.
- (ii) Additionally, all people in Governance Leadership Roles and Responsible Employees must identify any:
 - (A) Interest and Duty currently held or held within the last five years.

- (B) positions that may be regarded as an Elected Government Representative, Public Entity Official or Public Service Worker currently held or held in the last five years.

(b) Step 2: Evaluate:

All Australian Red Cross 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 the:

- (i) nature and type of Conflict, Duty, Interest, position(s) held, and parties involved.
- (ii) circumstances which have given rise or might give rise to the Conflict, Duty, Interest.
- (iii) effect and impact of the Conflict, Duty, Interest, or position(s) held on Australian Red Cross and its stakeholders.

(c) Step 3: Report:

All Australian Red Cross 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 Division Council Chair, 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) Step 4: 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 of Declarable Item(s) made by:	The treatment plan will be approved by:
Board Chair	Board
Board Members and Board Committee members	Board Chair
CEO	Board Chair
Division Council Chair	Board Chair
Division Councillors	Division Council Chair
Members of any committee of a Division Council (excluding Division Councillors)	Division Council
Other people in Governance Leadership Roles	Board Chair
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 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 people in Governance Leadership Roles and Responsible Employees 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 people in Governance Leadership Roles and Responsible Employees) shall be provided to the CEO, Board, 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 People in a Governance Leadership Role

Each person in a Governance Leadership Role must read and comply with the Governance Leadership Role Conflicts and Interests Procedure in addition to the requirements in the Policy.

4 Other
4.1 Definitions

Term	Definition
Australian Red Cross	Australian Red Cross Society.
Australian Red Cross	The same meaning as given to that term in the Rules.
Australian Red Cross Lifeblood	The same meaning as given to that term in the Rules.
Australian Red Cross People	As the context requires, all employees, volunteers, and members of Australian Red Cross.
Board	The same meaning as given to that term in the Rules.
Board Committee	The same meaning as given to that term in the Rules.
Close Relative	<p>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:</p> <ol style="list-style-type: none"> (1) a person in a close personal relationship with the individual, such as: <ol 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. (2) the individual's children, dependants, and grandchildren. (3) children, dependants, and grandchildren of a person in a close personal relationship with the individual. (4) the individual's immediate family, including a parent or sibling.
Conflict	<p>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.</p> <p>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></p>
Division Council	The same meaning as given to that term in the Rules.
Duty	<p>Any duty owed by people in Governance Leadership Roles or Responsible Employees to a beneficiary or any other person that is determined to be relevant having regard to:</p> <ol style="list-style-type: none"> (1) the nature and type of the other duty held by a person in a Governance Leadership Role or Responsible Employee (i.e., director of another entity); (2) whether the duty to Stakeholders and Australian Red Cross has the potential to be adversely impacted by the other duty held by a person in a Governance Leadership Role or Responsible Employee;

Term	Definition
	<p>(3) whether priority has been given to the duties to Australian Red Cross and Stakeholders despite the other duty held by a person in a Governance Leadership Role or Responsible Employee;</p> <p>(4) whether the duties to Stakeholders are being met despite the other duty held by the person in a Governance Leadership Role or Responsible Employee; and</p> <p>(5) does the other duty held by a person in a Governance Leadership Role or Responsible Employee cause a Conflict.</p>
Elected Government Representative	A person elected to be a member of parliament at the federal, state or territory level or elected to be a member/councillor of local government, through a process run by the Australian Electoral Commission, or another electoral commission or body that performs a role similar to the Australian Electoral Commission.
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>
Governance Leadership Role	<p>Any Australian Red Cross People appointed or elected to:</p> <p>(1) The National Council, the Board, a Board Committee or a Division Council.</p> <p>(2) The board or a board committee of Australian Red Cross Lifeblood.</p>
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 Department of Foreign Affairs & Trade).</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 person in a Governance Leadership Role or Responsible Employee that is determined to be relevant having regard to whether:</p> <p>(1) the interests of Australian Red Cross and Stakeholders are adversely affected by the interest held by a person in a Governance Leadership Role or Responsible Employee; or</p> <p>(2) priority has been given to the interests' held by a person in a Governance Leadership Role or Responsible Employee over the interests of Australian Red Cross and Stakeholders.</p>

Term	Definition
Interests Register	Register maintained by the Governance team where details of Conflicts, Duties, Hospitality, Interests, and Gifts disclosed are recorded, as well as any actions taken in connections with them.
National Council	The same meaning as given to that term in the Rules.
Public Entity Official	Any of the following: <ol style="list-style-type: none"> (1) Board members of a public institution (including schools, military, colleges, or universities). (2) Military personnel, including both permanent and Reserve Forces. (3) A member of a royal family. (4) Employees or a regulatory organisation for the financial services industry. (5) Employees or officials of an international public organisation (supranational) such as the United Nations, European Union institutions and Bodies, The World Bank Group. (6) Direct employees or elected officials of the International Committee of the Red Cross or the International Federation of Red Cross and Red Crescent Societies.
Public Service Worker	An employee of any of the following: <ol style="list-style-type: none"> (1) The federal government. (2) A federal government agency. (3) A state or territory government. (4) A state or territory government agency.
Related Parties	<ol style="list-style-type: none"> (1) Any Close Relative. (2) Any entity in which the individual has an Interest.
Responsible Employee	Any employees with internal job grades 8, 9, 10 or 'Executive'.
Rule(s)	The rules of Australian Red Cross (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) Elected Government Representatives Policy.
- (c) Fraud Prevention and Control Policy.
- (d) Interests Register (which records details of Conflicts, Duties, Hospitality, Interests, and Gifts disclosed).
- (e) Governance Leadership Role Conflicts and Interests Procedure.
- (f) Reporting Procedure.

4.3 Related legislation / standards

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