



CONFLICT OF INTEREST POLICY

OF

THE QUEER SOCIETY

Adopted by the Committee on 18/10/2025

Last updated 18/10/2025

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Chapter 1. About This Policy

Purpose

- (a) The purpose of this policy is to help board members of The Queer Society to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of The Queer Society and manage risk.
- (b) The Queer Society Board (called the 'board' in this policy) aims to ensure that board members are aware of their obligation to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of The Queer Society.

Scope and Persons Affected

- (c) This policy applies to the board members of The Queer Society

Definition of Conflicts of Interests

- (d) A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of the charity. 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 board member's duty to The Queer Society and another duty that the board member has (for example, to another charity). A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

Conflict of Interest Policy Principles

- (e) Open Effective Management: Conflict of interest are common, and they do not need to present a problem to the charity as long as they are openly and effectively managed.
- (f) Avoid conflicts of interest where possible
- (g) Careful Management
- (h) Responsive to breaches

Section 1. Conflict of Interest

Section 1. Responsibilities

- (a) The board is responsible for:
 - (i) establishing a system for identifying, disclosing and managing conflicts of interest across the charity
 - (ii) monitoring compliance with this policy,
 - (iii) reviewing this policy on an annual basis to ensure that the policy is operating effectively.
 - (iv) Ensuring that the Queer Society board members are aware of the ACNC governance standards, particularly Governance Standard 5, and that they disclose any actual or perceived material conflicts of interests as required by Governance Standard 5.

Section 2. Identification and disclosure

- (a) The Queer Society once an actual, potential or perceived conflict of interest is identified, it must
 - (i) entered the conflict into The Queer Society's register of interests,
 - (ii) and raise with the board.
- (b) If all board members have the same conflict of interest, The Queer Society must
 - (i) consider whether it is still able to comply with the ACNC Governance Standards, especially Governance Standard 5,
 - (ii) should refer to ACNC Governance Standard 5 to ensure that proper disclosure occurs.
 - (iii) take reasonable steps to ensure that its board members are subject to, and comply with, the relevant duties.
- (c) The Queer Society may:
 - (i) obtain professional advice,
 - (ii) consider whether there are any relevant exceptions in its governing document or legislation,

- (iii) consider whether it is appropriate for members to pass a resolution in a general meeting,
 - (iv) consider appointing new board members and note that its board members may consider whether they can continue in the role.
- (d) The register of interests must:
 - (i) be maintained by the Secretary
 - (ii) Record information related to a conflict of interest including:
 - (1) the nature
 - (2) extent of the conflict of interest
 - (3) any steps taken to address it

Section 3. Confidentiality

- (a) All conflict of interest disclosures shall be treated as confidential and managed in accordance with this policy.
- (b) Access to disclosed information shall be restricted to:
 - (i) The President of the Board
 - (ii) The Secretary, for the purpose of maintaining the Conflict of Interest Register
 - (iii) Board Members where access is necessary for the Board to consider and manage the declared conflict.
- (c) Disclosed information shall not be shared beyond the individuals listed above unless required by law or with the express consent of the individual making the disclosure.
- (d) Where a disclosure involves sensitive or personal information, the individual may request that details be provided directly to the President or a nominated independent Board Member as an alternative disclosure mechanism. In such cases, the disclosure shall be recorded in the register in general terms sufficient to ensure transparency while maintaining confidentiality.
- (e) All individuals granted access to conflict of interest information are required to maintain strict confidentiality and shall not use, disclose, or discuss any information obtained through this process for personal, professional, or third-party benefit.

Section 2. Managing Conflict of Interests

Section 1. Conflicts of interest of board members

- (a) Once the conflict of interest has been appropriately disclosed, the board (excluding the board member who has made the disclosure, as well as any other conflicted board member) must decide whether or not those conflicted board members should:
 - (i) vote on the matter (this is a minimum),
 - (ii) participate in any debate, or
 - (iii) be present in the room during the debate and the voting.
- (b) In exceptional circumstances, such as where a conflict is very significant or likely to prevent a board member from regularly participating in discussions, it may be worth the board considering if it is appropriate for the person conflicted to resign from the board

Section 2. What should be considered when deciding what action to take

- (a) In deciding what approach to take, the board will consider:
 - (i) whether the conflict needs to be avoided or simply documented
 - (ii) whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
 - (iii) alternative options to avoid the conflict
 - (iv) the charity's objects and resources, and
 - (v) the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the charity.
- (b) The approval of any action requires the agreement of at least a majority of the board (excluding any conflicted board member/s) who are present and voting at the meeting.
- (c) The action and result of the voting will be recorded in the minutes of the meeting and in the register of interests.

Section 3. Compliance

Section 1. Failure to comply

- (a) If the board has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances.
- (b) If it is found that a person has failed to disclose a conflict of interest, the Board may take appropriate action the board may take action against them.
- (c) This may include, but is not limited to:
 - (i) Issuing a formal warning;
 - (ii) Requiring the individual to undertake governance or ethics training;
 - (iii) Suspension or removal from decision-making duties; or
 - (iv) Termination of their relationship with The Queer Society.