



DOOR OF HOPE AUSTRALIA INC

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DOHA CONFLICT OF INTEREST POLICY

1. Introduction

The Board of Door of Hope Australia Inc. (DOHA) is committed to high standards of ethical conduct. As a Christian organisation, we place great importance on integrity and transparency, ensuring that all decisions are made solely in the best interests of our mission and the communities we serve.

2. Purpose and Scope

This policy provides a framework for identifying, disclosing, and managing conflicts of interest. It applies to:

- All members of the Board of Directors (BD).
- All employees, contractors, and consultants.
- All volunteers and interns.

3. Definitions

- **Conflict of Interest:** Occurs when a person's personal interests (financial, professional, or social) conflict with their responsibility to act in the best interests of DOHA.
- **Personal Interests:** Includes the interests of family members, close friends, or other organizations the person is involved with.
- **Related Party Transaction:** A transfer of resources, services, or obligations between DOHA and a "related party" (such as a Board member's private business or a family member's charity).

Types of Conflict:

- **Actual:** A conflict that currently exists.
- **Potential:** A situation that may become a conflict in the future.
- **Perceived:** Where it appears to a reasonable observer that a conflict exists, even if it does not.

4. Policy Principles

- **Primary Duty:** The interests of DOHA always take precedence over personal interests.
- **Transparency:** All conflicts, whether perceived or actual, must be disclosed.
- **Documentation:** All disclosures and management plans must be recorded in the DOHA Conflict of Interest Register.

5. Management Procedure for Board Members

1. **Disclosure:** At the beginning of every Board meeting, "Conflict of Interest" will be a standing agenda item. Members must declare any interest in any item on the agenda.
2. **Assessment:** The non-conflicted members of the Board will determine whether the interest is material.
3. **Management:** If a material conflict is identified, the concerned member must:
 - Leave the room during the discussion.
 - Not participate in the vote.
 - Not attempt to influence the discussion outside of the meeting.
4. **Reporting:** The minutes must record the disclosure, the departure and return of the member, and the outcome of the vote.

6. Management Procedure for Employees and Volunteers

- **Annual Declaration:** All staff and key volunteers must complete an Annual Declaration of Interests form.
- **Ongoing Disclosure:** If a conflict arises during the year (e.g., a staff member's spouse is an executive at a potential partner NGO), it must be reported to the Project Manager immediately.
- **Gift Policy:** To ensure transparency:
 - No representative may solicit or receive gifts that could influence their decision-making.
 - Small token gifts (under \$50 value) associated with cultural events or anniversaries may be accepted but must be reported to the Project Manager if they exceed a "nominal" value.

7. Related Party Transactions

DOHA will only enter into a transaction with a related party (e.g., hiring a Board member's company for a service) if:

- The transaction is at "arm's length" (market rates or better for DOHA).
- Multiple quotes have been obtained.

- The Board (excluding the interested member) approves the transaction as being in the best interest of the charity.

8. Breaches of Policy

Failure to disclose a conflict of interest is a breach of DOHA's Code of Conduct and may lead to:

- **For Board Members:** Resignation or removal from the Board.
- **For Employees:** Disciplinary action, up to and including termination.

9. Record Keeping

The Project Manager will maintain the Conflict of Interest Register. This register is a confidential document but will be made available for ACFID or ACNC audits upon request.

10. Review

This policy will be reviewed every two years to ensure it remains consistent with ACFID requirements and Australian Law.

Last Reviewed: 13th March 2026

Next Review: [Date + 2 Years]