



Conflicts of Interest Policy

This policy supports CPA's mission and values

OUR VALUES

Respectful

Ethical

Passionate

Curious

Courageous

Purpose

To protect CPA's reputation and interests by preventing employees and volunteers from using or seeming to use their position for personal gain at the cost of CPA or its clients.

To make sure that actual (real), potential and perceived [conflicts of interest](#) for employees / volunteers and CPA as an organisation are identified and managed effectively.

To monitor employees' [secondary employment](#) to make sure client services are delivered safely and that CPA meets its Work, Health and Safety responsibilities to manage risks and keep people safe.

Policy statement

CPA has processes in place to respond to and manage disclosed conflicts of interest (actual / real, potential and perceived). Conflicts of interest can be related to employees / volunteers or the organisation.

CPA recognises that employees may have other employment in addition to their role with CPA (secondary employment). This employment can help staff to gain useful skills and experience that benefits their work at CPA. Secondary employment can also introduce additional conflicts of interest.

Who is this policy for?

This policy is for employees (including casual and temporary / fixed term contract employees) and volunteers. (A separate Conflicts of Interests Policy as part of the [Board Charter](#) applies to Members of the Board.)

Who is responsible for this policy?

The following roles and teams make sure staff know what the policy says and what they need to do:

- Managers
- Supervisors
- Senior managers
- People and Culture Team
- Chief People Officer
- General Counsel and Company Secretary
- The CEO or their delegate will make the final decision whether there is a conflict of interest and what action should be taken.

Policy in action

- Conflicts of interest may relate to:
 - CPA organisational conflicts of interest or
 - employee / volunteer conflicts of interest. These conflicts may be financial, relational or business-related. See [Employee / Volunteer Examples of Conflicts of Interest and Remediation Guidelines](#).
- Disclosure of conflicts of interest:
 - It is best practice to tell CPA as early as possible if there is the possibility of a conflict of interest.
 - All new employees must disclose actual / real, perceived or potential conflicts of interest / secondary employment during the recruitment process in Workday.
 - Existing employees / volunteers who have a conflict of interest (actual / real, perceived or potential) should promptly complete the Conflict of Interest Disclosure Form in Workday. See [Conflict of Interest Procedure](#).
- Disability Support Practitioners (DSPs): Managers will discuss conflict of interests / secondary employment at quarterly supervision meetings.
- Other employees (non-DSPs): will receive an annual reminder via Workday (around their CPA anniversary date) to complete the form for Manager review. Employees are to complete the form (a) annually to advise of / update existing conflicts and (b) when a conflict of interest arises.

- Secondary employment:
 - CPA expects employees will not undertake secondary employment if it:
 - does not meet the requirements of this policy
 - increases safety or Work, Health and Safety risks to staff or clients, especially due to fatigue
 - impacts their ability to perform their primary role with CPA
 - creates a [conflict of interest](#) that cannot be adequately controlled, managed or eliminated.
 - If there are concerns about an employee's secondary employment, the manager and employee will discuss and consult with P&C if required.
- Fundraising:
 - CPA Executive Team, CPA Board Members, or their spouses, are not permitted to claim raffle or other prizes from CPA fundraising activities. They can enter a raffle or competition, but it is expected that any prizes won will be donated back to CPA.
 - CPA employees, CPA Research Foundation Governors and CPA event committee members are permitted to enter raffles and claim other prizes from CPA fundraising activities.
 - All CPA employees, Board Members, Governors and event committee members are permitted to purchase silent and live auction items at CPA fundraising events. (See [Fundraising Policy](#).)
- Personal, professional or family relationship conflicts of interest:
 - Employees / Volunteers who have a relationship with another employee must inform their Manager:
 - before taking a role where they will work together (same team, site or location).
 - where one employee is in a role with authority over the other.
 - Employees who are family or in a personal relationship cannot work together (in same team, site or location) if their roles involve direct care or support for the same clients or families. This is due to duty of care responsibilities.
- As an organisation, CPA may have perceived, potential or actual (real) conflicts of interest. These conflicts will be assessed as they arise, and controls will be put in place. See [CPA Organisational Conflict of Interest Register and Management](#).
- The General Counsel and Company Secretary maintains a Conflicts of Interest Register, for Board-related conflicts of interest.

Definitions

(Note: The meanings of words used a lot at CPA are located in the [CPA Common Definitions](#). The words in the list below are new and are only used in this policy and the other documents that are part of this policy).

Employee / Volunteer Conflict of interest

An employee / volunteer conflict of interest occurs when personal interests – such as those involving family, friends or other organisations – may interfere or appear to interfere with a person's duty to act in CPA's best interest. These situations risk biased decisions and must be appropriately managed.

Organisational Conflict of interest

An organisational conflict of interest for an NDIS provider is when a provider's personal, financial or organisational interest may interfere or appear to interfere with their ability to act in the best interest of their clients. As a result, the provider may make decisions that benefit the organisation rather than prioritising the needs and choices of clients.

Types of Conflicts of Interest

A Conflict of Interest may be:

- Actual (real) – it happened or is happening.
- Potential – it might happen.
- Perceived – it seems like it has happened or might happen.

Primary role

For the purposes of this policy, the employee's primary role is the role they have with CPA.

If an employee has both part-time and casual roles with CPA, the permanent role is their primary role.

Secondary employment

Secondary employment is work undertaken in addition to an employee's primary role with CPA. It may be work with another employer or as a sole trader/contractor.

Secondary employment includes employment already held by an employee at the time they start with CPA.

Examples of secondary employment include

- a Disability Support Practitioner who works for another disability service provider or as a Personal Care Worker for an aged care facility
- external consultancy work
- owning / operating a business

Documents that are part of this policy

Guidelines

[Employee / Volunteer Examples of Conflicts of Interest and Remediation Guidelines](#)

[Conflict of Interest Fact Sheet](#)

[CPA Organisational Conflict of Interest Register and Management](#)

Procedures

[Conflicts of Interest Procedure](#)

[Substantial Gift Procedure](#)

Related Policies and Further Reading

[Governance and Operational Management Policy](#) (Gifts and Hospitality)

[Fundraising Policy](#)

[Code of Conduct Policy](#)

[Whistleblowing \(Protected Disclosure\) Policy](#)

[Recruitment Policy](#)

[Managing Performance Policy](#)

CPA Board Handbook

External

[Conflicts of Interest in the NDIS provider market](#)

[NDIA Position Statement on Conflicts of Interest in the NDIS Provider Market](#)

Policy Owner	Chief People Officer / General Counsel and Company Secretary
Date Approved	24/11/25
Approval Authority	CEO
Date of Commencement	1 December 2016
Date for Next Review	November 2028
Related Legislation	

Revision history

Please email policyfeedback@cerebralpalsy.org.au for access to past policies and/or further revision history details.

Review Date	Revision Details
3/12/25	<p>Scheduled review. Updated to reflect Workday automation of Conflict of Interest Form and Secondary Employment Form.</p> <p>Policy ownership updated to include both Chief People Officer and General Counsel and Company Secretary.</p> <p>Major updates to:</p> <ul style="list-style-type: none"> • Conflict of Interest Policy, including plain language translation • Conflicts of Interest Procedure <p>Added:</p> <ul style="list-style-type: none"> • Employee / Volunteer Examples of Conflicts of Interest and Remediation Guidelines • (replacing Examples of Conflict of Interest Guidelines) • Conflict of Interest Fact Sheet • CPA Organisational Conflict of Interest Register and Management • Substantial Gift Procedure <p>Deleted:</p> <ul style="list-style-type: none"> • Examples of Conflict of Interest Guidelines • Conflict of Interest Disclosure Form • Secondary Employment Notification Form <p>Secondary Employment Policy documents incorporated into Conflict of Interest Policy (Secondary Employment Policy has been rescinded):</p> <ul style="list-style-type: none"> • Secondary Employment Policy • Secondary Employment Notification Procedure.