

Policy:	Policy Manual No.	Authorised By:	Policy Section:	Effective:	Review Date:
Conflict of Interest Policy (COI)	GOV-COI	Governance Group	Governance and Accountability (GOV)	Upon approval	April 2029; 3-yearly

Conflict of Interest Policy (COI)

Public-facing policy for identifying, declaring, recording and managing actual, potential and perceived conflicts of interest

Property of Glenfield Community Centre Incorporated

Last reviewed April 2026 | Next review April 2029 | Version 2026.1

1 Purpose:

The purpose of this policy is to ensure that Glenfield Community Centre Incorporated (GCC) identifies, discloses, records and manages actual, potential and perceived conflicts of interest in a way that protects GCC's charitable purpose, lawful decision-making, transparency, reputation and community accountability.

2 Scope:

This policy applies to Governance Group members, officers, committee and sub-committee members, staff, volunteers, contractors, advisers, members and any other person who is involved in advising on, influencing, recommending, approving or implementing GCC decisions.

This policy applies to governance, employment, procurement, finance, funding, room hire, tenancy, contractor, partnership, sponsorship, donation, complaints, membership, communications, confidential information and any other matter where a personal interest, relationship, duty or loyalty may affect, or appear to affect, a person's ability to act in GCC's best interests.

Where the GCC Constitution, legislation, funding agreement, lease, contract or another approved GCC policy requires a stricter process, the stricter requirement applies.

3 Policy Statement:

GCC recognises that conflicts of interest can arise in community organisations and do not necessarily indicate wrongdoing. The risk arises when an interest is not disclosed, recorded or managed properly.

GCC will maintain an Interests Register and will manage conflicts of interest openly, fairly, consistently and proportionately. Decisions must be made in GCC's best interests and in accordance with its Constitution, charitable purposes, legal obligations, funding obligations and values.

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Conflict of Interest Policy (COI)	GOV-COI	Governance Group	Governance and Accountability (GOV)	Upon approval	April 2029; 3-yearly

A person with an actual, potential or perceived conflict of interest must disclose the interest as soon as they become aware of it and must comply with any management action decided under this policy.

This policy must be read consistently with the GCC Constitution, including the Society's Principles, Objects, Governance Group powers, dispute-resolution requirements, financial-gain provisions and Appendix A values.

4 Definitions:

Conflict of Interest: Any situation where a person's personal interests, relationships, duties, loyalties or other commitments could affect, or could reasonably be seen to affect, their ability to act in GCC's best interests.

Actual Conflict: A conflict that currently exists.

Potential Conflict: A conflict that could arise in the future.

Perceived Conflict: A situation where a reasonable person could think a conflict exists, even if the person concerned believes they can act impartially.

Financial Interest: An interest involving money, payment, employment, contracts, discounts, loans, gifts, property, services, business opportunities or other financial benefit.

Non-financial Interest: An interest involving personal relationships, professional loyalties, organisational affiliations, reputation, influence, access to information, ideology or other non-monetary benefit.

Interested Officer: For the purposes of the Incorporated Societies Act 2022, an officer is interested in a matter if they may obtain a financial benefit, a close relative may obtain a financial benefit, they have a financial interest in a person to whom the matter relates, they are a partner, director, officer, board member or trustee of a person with a relevant financial interest, or the GCC Constitution otherwise provides that they are interested.

Family / Whānau or Close Personal Relationship: A spouse, civil union partner, de facto partner, child, parent, grandparent, grandchild, sibling, nephew, niece, uncle, aunt, first cousin, household member, close friend or another person whose relationship could reasonably affect impartial decision-making.

Interests Register: The controlled record of disclosed interests and the agreed action for managing them.

Related Party Transaction: A transaction or arrangement where a person connected with GCC, or a related person or organisation, may receive a financial or other benefit that must be considered for transparency, decision-making and financial reporting purposes.

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Conflict of Interest Policy (COI)	GOV-COI	Governance Group	Governance and Accountability (GOV)	Upon approval	April 2029; 3-yearly

5 Roles and Responsibilities:

Governance Group: Approves this policy, maintains oversight of conflict management, ensures an Interests Register is kept, and decides how significant governance-level conflicts will be managed.

Chair: Ensures declarations are called for at meetings, leads the management of conflicts during meetings, and may seek advice where a conflict is complex or sensitive.

Governance Group members and officers: Must disclose interests as soon as practicable, update declarations when circumstances change, follow agreed management actions, and not vote, decide or sign documents where prohibited or restricted.

Centre Manager: Maintains or arranges maintenance of the Interests Register, supports implementation of this policy, records disclosures where relevant, and escalates governance, legal, financial, privacy, employment, reputation or health and safety risks to the Chair or Governance.

Staff, volunteers, contractors and advisers: Must disclose interests relevant to their role, work or advice, particularly where they are involved in procurement, employment, finance, room hire, tenant, contractor, event, funding or complaint matters.

Minute-taker / Secretary: Records declarations, agreed management actions, withdrawals from discussion or decisions, voting exclusions and relevant minute references.

6 Procedure / Implementation:

GCC will manage conflicts of interest using the following process.

1. Identify interests early. People covered by this policy must consider whether their personal interests, relationships, duties, loyalties or external roles may affect a GCC matter.
2. Disclose interests promptly. Disclosures must be made to the Chair, Centre Manager, relevant Policy Owner, committee or Governance Group as soon as practicable after the person becomes aware of the interest.
3. Declare conflicts at meetings. Declarations of actual, potential or perceived conflicts of interest must be a standing item at Governance and committee meetings.
4. Record interests. Disclosures and agreed management actions must be recorded in the Interests Register and, where relevant, in meeting minutes.
5. Decide the management action. Governance, the Chair, Centre Manager or relevant approval body must decide how the conflict will be managed based on seriousness, legal requirements, risk and public perception.
6. Implement the management action. The affected person must comply with the agreed action and must not use their position or access to information for personal advantage or for the advantage of another person or organisation.

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7. Review ongoing interests. Continuing interests must be reviewed when circumstances change, when the related matter returns for decision, and at least annually.

Management actions may include one or more of the following:

- recording the interest with no further action where the interest is remote or insignificant;
- allowing the person to provide factual information only;
- excluding the person from discussion, deliberation, decision-making, voting or document signing;
- requiring the person to leave the room or online meeting while the matter is discussed or decided;
- using an independent person, independent quote, competitive procurement process or external adviser;
- referring the matter to Governance, a committee, the Chair, members at a General Meeting, or an external adviser;
- declining, changing or delaying the proposed transaction, appointment, contract, arrangement or decision;
- considering whether a related party transaction must be recorded in financial statements; or
- requiring resignation from a role or withdrawal from a process where the conflict cannot be managed adequately.

A Governance Group member or officer who is interested in a matter must not vote or take part in a decision relating to the matter, and must not sign documents relating to the transaction or initiation of the matter, unless permitted by law, the Constitution and an agreed governance decision. If 50% or more of the Governance Group are prevented from voting on a matter because of interests, the matter must be referred to a Special General Meeting where required by law or the Constitution.

Where an interest relates to a contract, lease, hire arrangement, payment, banking authorisation, procurement process, employment matter, complaint, grievance or member dispute, GCC must ensure that conflicted people do not authorise, approve, sign, investigate or decide the matter unless permitted by the Constitution, legislation and an agreed conflict-management decision.

The GCC Constitution allows certain payments, reimbursements, arm's-length transactions and incidental benefits where they are consistent with the Society's purposes and are not for the financial gain of members. This policy does not prohibit such arrangements; it requires them to be disclosed, recorded, assessed and managed so that GCC's charitable purpose, accountability and decision-making are protected.

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Where the Executive Committee or Centre Manager makes an operational decision between Governance Group meetings, any conflict of interest relevant to that decision must be disclosed when the decision is reported to Governance for retrospective ratification and inclusion in the minutes.

A person must not act as a decision-maker in relation to a complaint, grievance, disciplinary process, procurement process or other contested matter if there are reasonable grounds to believe they may not be impartial or may have a predetermined view.

7 Monitoring, Reporting and Breach Management:

The Interests Register must be reviewed at least annually and as part of the preparation for the AGM, annual report, audit or financial reporting process where relevant. Governance must be provided with enough information to understand any material conflicts, related party transactions and decisions made to manage them.

The annual reporting process must enable the Society to receive a summary of any disclosures, or the types of disclosures, made by Governance Group members about interests in matters being considered by or affecting the Society since the previous Annual General Meeting, as required by the Constitution.

Meeting minutes must record declarations of interest, the person affected, the nature of the interest, whether the interest was already recorded, the management action agreed, any withdrawal from discussion or decision-making, and whether the person was excluded from voting or signing documents.

A failure to disclose or manage a conflict of interest may be treated as a breach of this policy and may result in one or more of the following actions:

- updating the Interests Register and meeting minutes;
- reconsidering or reviewing the affected decision, transaction or process;
- notifying members or another party where required by law, the Constitution, funding agreement or Governance decision;
- seeking legal, accounting, employment, privacy or governance advice;
- disciplinary action, performance management or removal from a delegated role, where appropriate and lawful;
- reporting to a regulator, funder, auditor or insurer where required; or
- reviewing this policy or related procedures to prevent recurrence.

Breaches must be managed fairly and proportionately, considering the seriousness of the conflict, whether the failure was deliberate or inadvertent, the impact on GCC, and any legal or reporting obligations.

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8 Legal and Compliance Requirements:

This policy is intended to support compliance with current statutes, regulations, constitutional requirements, charitable obligations, funding obligations and recognised good-practice requirements relevant to conflicts of interest.

Relevant requirements include, but are not limited to:

- GCC Constitution;
- Incorporated Societies Act 2022;
- Charities Act 2005;
- Privacy Act 2020;
- Employment Relations Act 2000;
- Health and Safety at Work Act 2015;
- Protected Disclosures (Protection of Whistleblowers) Act 2022;
- Auckland Council, Kaipātiki Local Board, lease, funding and accountability requirements; and
- financial reporting requirements for related party transactions where applicable.

The Incorporated Societies Act 2022 requires officers to disclose interests to the committee and in an interests register. It also restricts interested committee members from voting, taking part in decisions or signing relevant documents unless the Act, Constitution and non-interested committee members permit otherwise.

Charities Services guidance recognises that conflicts of interest may be actual, potential or perceived, financial or non-financial, and should be identified, declared, recorded and managed so decisions are made in the charity's best interests.

Relevant constitutional provisions include the Society's Objects and Te Tiriti commitment; AGM reporting requirements for disclosures of interest; Governance Group composition, powers, delegation, finance and employment responsibilities; Executive Committee reporting and ratification requirements; dispute-resolution impartiality requirements; and the Financial Gain clause permitting specified arm's-length transactions where they do not amount to operating for member financial gain.

If there is any inconsistency between this policy and the GCC Constitution, the Constitution prevails unless Governance determines that the Constitution itself requires amendment to comply with law.

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9 Related Documents:

- GCC Constitution;
- Policy and Procedure Framework;
- Master Policy and Procedure Register;
- Delegations Policy / Delegations Schedule;
- Finance Policy;
- Procurement Policy, if adopted;
- Privacy Policy;
- Protected Disclosures Policy;
- Complaints and Feedback Policy;
- Staff Code of Conduct;
- Governance Code of Conduct, if adopted;
- Interest Declaration Form;
- Interests Register; and
- Meeting minutes and annual reporting records.

10 Document Management Control:

Prepared by	Centre Manager
Policy Owner	Governance Group / Chair
Authorised by	Governance Group
Approved by	Governance Meeting Motion: [insert motion number]
Date issued	April 2026
Last reviewed	April 2026
Review frequency	Three-yearly, or earlier if legislation, governance, risk, funding, structure or operational requirements change
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Appendix One - Interests Register Fields:

The Interests Register should record the following information for each disclosed interest, unless Governance approves a different structure.

Field	Purpose
Date disclosed	Date the interest was disclosed.
Person disclosing	Name and role of the person making the disclosure.
Type of interest	Actual, potential or perceived; financial or non-financial.
Nature and extent of interest	Plain-English summary of the interest, including monetary value if it can be quantified.
Related person or organisation	Name of any related person, family / whānau member, business, charity, supplier, tenant, hirer or other organisation involved.
Matter or decision affected	Agenda item, contract, grant, employment matter, procurement decision, tenancy, hire arrangement or other matter affected.
Management action agreed	For example: noted only, left room, excluded from discussion, excluded from vote, no document signing, independent review, special general meeting.
Decision / outcome	Decision made and confirmation that the process protected GCC's interests.
Minute reference	Meeting date and minute reference.
Review / closure date	Date the interest was reviewed, updated or closed.
Notes	Any further relevant information.

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Appendix Two - Conflict of Interest Declaration Form:

This declaration may be used annually, when a person is appointed or elected, and whenever a new interest arises.

Name	
Role / position	
Date	
I declare the following actual, potential or perceived interests	
Nature and extent of interest, including any financial value if known	
Related person, organisation, supplier, tenant, hirer, funder or other party	
Matter, decision or activity affected	
Proposed management action	
Signature	

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Appendix Three - Meeting Minute Wording:

The following wording may be adapted for Governance or committee minutes.

Scenario	Suggested wording
No conflicts declared	The Chair called for declarations of actual, potential or perceived conflicts of interest relating to the agenda. No conflicts were declared.
Conflict declared and managed	[Name] declared an actual / potential / perceived conflict of interest in relation to [agenda item / matter]. The nature of the interest was [summary]. Governance agreed that [Name] would [remain for factual questions only / leave the room / not participate in discussion / not vote / not sign related documents]. The interest and agreed management action will be recorded in the Interests Register.
Interest previously registered	Governance noted that [Name] has an interest recorded in the Interests Register relevant to [matter]. Governance confirmed the agreed management action remains appropriate.
Failure to disclose	Governance became aware of a possible failure to disclose an interest relating to [matter]. Governance agreed to review the matter, update the Interests Register, assess whether member notification is required, and consider whether any further action is necessary.