

MONTESSORI MINDS CONFLICT OF INTEREST POLICY

PURPOSE

Montessori Minds is committed to acting with integrity, fairness, transparency, and professionalism in all service operations, decision-making, and relationships.

The purpose of this policy is to ensure that decisions made on behalf of the service are in the best interests of children, families, staff, and the organisation, and are free from improper influence.

This policy provides guidance for identifying, disclosing, recording, and managing any actual, potential, or perceived conflict of interest.

POLICY STATEMENT

Montessori Minds expects all staff and representatives of the service to act honestly, ethically, and in the best interests of the service at all times.

A conflict of interest may arise when a person's private interests, relationships, financial interests, external roles, or personal associations interfere, or appear to interfere, with their ability to perform their role objectively and in the best interests of Montessori Minds.

All actual, potential, or perceived conflicts of interest must be disclosed as soon as possible and managed appropriately.

Failure to disclose a relevant conflict of interest may result in disciplinary action.

SCOPE

This policy applies to all people engaged with Montessori Minds, including the Approved Provider, Nominated Supervisor, Centre Director, Educational Leader, educators, administration staff, volunteers, students, contractors, consultants, and relief or casual staff.

DEFINITIONS

Conflict of Interest: A situation where a person's personal, family, financial, professional, or other private interest could influence, or be seen to influence, their decisions, actions, or judgment in their role at Montessori Minds.

Actual Conflict: A real and existing conflict between a person's duties and their private interests.

Potential Conflict: A situation that may develop into a conflict of interest in the future.

Perceived Conflict: A situation where it may appear to others that a person's private interests could improperly influence their decisions, even if this is not actually the case.

EXAMPLES OF CONFLICT OF INTEREST

- Employing, supervising, or influencing the recruitment of a family member or close friend
- Purchasing goods or services from a business owned by a staff member, family member, or associate without transparent approval
- Accepting gifts, benefits, discounts, or favours that may influence decision-making
- Holding outside employment or business interests that interfere with duties at Montessori Minds
- Using confidential service information for personal benefit
- Participating in decisions involving one's own financial interest
- Recommending contractors, suppliers, or service providers where there is a personal relationship or financial gain
- Being involved in complaints, investigations, enrolments, staffing, or disciplinary matters concerning a family member or close associate
- Using one's position to obtain an unfair advantage for self or others

PRINCIPLES

Transparency

All relevant interests must be disclosed so that decisions remain open and accountable.

Integrity

Decisions must be made honestly, ethically, and in the best interests of the service.

Accountability

All people are responsible for identifying and declaring conflicts.

Fairness

Recruitment, procurement, enrolment, and operational decisions must be based on merit and proper process.

Confidentiality

Disclosures must be handled sensitively and only shared with authorized persons.

Child safety focus

All actions and decisions must prioritize child safety and wellbeing.

RESPONSIBILITIES

Approved Provider / Management

- ensure this policy is implemented and reviewed
- maintain a register of declared conflicts of interest
- assess disclosed conflicts fairly and promptly
- determine and document management actions
- ensure decisions are transparent and defensible
- monitor compliance with this policy

Centre Director / Nominated Supervisor

- promote awareness of this policy
- ensure staff understand their obligation to disclose conflicts
- record and escalate declarations where needed
- manage conflicts in line with approved processes
- ensure staff are not involved in decisions where a conflict exists

Employees, volunteers, contractors, and other representatives

- avoid situations where personal interests conflict with professional duties
- declare actual, potential, or perceived conflicts as soon as they arise
- complete a conflict of interest declaration form when required
- comply with management directions to reduce or remove the conflict
- not use their role for private gain

WHEN A CONFLICT OF INTEREST MUST BE DECLARED

- on commencement of employment or engagement, where relevant
- as soon as a new conflict arises
- before participating in any related decision-making process
- annually, if the service requires an annual declaration
- whenever requested by management

PROCEDURES FOR DISCLOSURE

- Inform the Centre Director, Nominated Supervisor, or Approved Provider as soon as possible.
- Complete the Conflict of Interest Declaration Form.
- Provide full and honest details of the conflict.
- Refrain from participating in any related discussion or decision-making until the matter is reviewed.
- Comply with the management strategy determined by Montessori Minds.

MANAGING A CONFLICT OF INTEREST

- no action required, with disclosure noted
- monitoring of the situation
- restriction from involvement in related discussions or decisions
- reassignment of duties
- additional supervision or oversight
- obtaining quotes or independent approval for procurement decisions
- requiring the individual to step aside from a process
- ending or avoiding the conflicting arrangement where necessary

GIFTS, BENEFITS, AND HOSPITALITY

Employees and representatives of Montessori Minds must not accept gifts, benefits, or hospitality that could influence, or reasonably be seen to influence, their professional judgment or actions.

Minor tokens of appreciation may only be accepted where they are modest, infrequent, and do not create any actual or perceived obligation. Where there is any doubt, the matter must be disclosed to management.

This policy should be read alongside the Montessori Minds expectations regarding professional boundaries, ethical conduct, and any no-gift guidance issued by the service.

RECRUITMENT, PURCHASING, AND CONTRACTING

To maintain transparency and fairness, staff must declare any relationship with applicants, suppliers, contractors, or service providers. Staff with a conflict must not independently make or influence decisions in such matters. Decisions involving procurement or recruitment must be documented and, where required, independently reviewed or approved.

CONFIDENTIALITY AND MISUSE OF POSITION

Confidential information obtained through a role at Montessori Minds must not be used for personal benefit or disclosed improperly to others.

No person may use their position, influence, or access to service information to gain an advantage for themselves, family members, friends, or business associates.

RECORD KEEPING

Montessori Minds will maintain completed conflict of interest declaration forms, a conflict of interest register where applicable, records of actions taken to manage conflicts, and relevant review notes and approvals.

Records will be stored securely and accessed only by authorised persons.

BREACH OF POLICY

Failure to disclose a conflict of interest, providing misleading information, or failing to comply with management directions under this policy may result in counselling, a formal warning, disciplinary action, or termination of employment or engagement where appropriate.

Serious breaches may also be addressed under other relevant service policies and procedures.

RELATED POLICIES AND DOCUMENTS

- Code of Conduct
- Child Safe Environment / Child Safety Policy
- E-Safety Policy
- Privacy and Confidentiality Policy
- Recruitment and Selection Policy
- Complaints and Grievances Policy
- Governance and Leadership procedures
- Staff Handbook

Approval and review

Created date	April,2025
Consultation	Approved Provider, Centre Director, Educational leader and staff members
Endorsed by	Aseem Gupta
Endorsed on	31/04/2025
Next review date	June 2026

Attachment 1 – Conflict of Interest Declaration Form

Use this form to declare any actual, potential, or perceived conflict of interest.

Full Name	_____

Position / Role	_____

Room / Department	_____

Employment Type	_____

Date	_____

How could this affect your role or decision-making?

<input type="checkbox"/> Actual conflict	<input type="checkbox"/> Potential conflict
<input type="checkbox"/> Perceived conflict	<input type="checkbox"/> Annual / update

<input type="checkbox"/> Family relationship	<input type="checkbox"/> Close personal relationship
<input type="checkbox"/> Financial interest	<input type="checkbox"/> Business interest
<input type="checkbox"/> External employment	<input type="checkbox"/> Recruitment matter
<input type="checkbox"/> Supplier / purchasing matter	<input type="checkbox"/> Other: _____

Details of conflict of interest

Proposed action by declarant



Declaration

I declare that the information provided is true and complete to the best of my knowledge. I understand my responsibility to disclose any actual, potential, or perceived conflict of interest and to act in accordance with Montessori Minds policies and management directions.

Received by	_____
Position	_____
Assessment outcome	<input type="checkbox"/> noted <input type="checkbox"/> monitor <input type="checkbox"/> restrict <input type="checkbox"/> reassign
Approved by	_____
Signature	_____
Review date	_____

Signature: _____	Name: _____
Date: _____	Position: _____