

Conflicts Management

Council Policy



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Type	Council Policy		
Owner	Chief Executive Officer		
Responsible Officer	Manager Governance		
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1 Purpose

The purpose of this policy is to set out a framework to guide Alice Springs Town Council (ASTC) to ensure that any actual, potential or perceived conflicts of interest and conflicts of duties are appropriately identified, considered and managed.

The prudent management of conflicts will ensure the duties to, and the interests of, the community of ASTC are not adversely affected by a conflict. It will also assist ASTC in:

- compliance with regulatory obligations in relation to the management of conflicts;
- promoting integrity and quality of its services;
- improving its relationship with community, businesses and service providers, employees and other stakeholders; and
- preserving its brand and reputation.

This policy applies to Elected Members and employees including the CEO and Directors of Alice Springs Town Council.

2 Definitions

For the purposes of this policy, the following definitions apply:

Term	Definition
ASTC	Alice Springs Town Council
Actual conflict	Refers to a real conflict.
Associate	<p>ⁱA person is an associate of another if:</p> <ul style="list-style-type: none">(a) they are in a close family relationship; or(b) they are in partnership; or(c) one is a company and the other is a director or manager of the company; or(d) they are related companies; or(e) one is a private company and the other is a shareholder in the company; or(f) a chain of relationships can be traced between them under one or more of the above paragraphs.

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Term	Definition
Conflict	<p>A person has a conflict of interest in a question arising for decision if the person or an associate of the person has a personal or financial interest in how the question is decided.</p> <p>Refers to a conflict between:</p> <ul style="list-style-type: none"> (a) the duties owed by ASTC or an Elected Member, to Community/Clients and the duties owed by them to any other person; (b) the interests of Community and the duties owed by ASTC or an elected member, to any other person; (c) an interest of ASTC, Elected Member or an Employee, and duties to the Community and an interest of ASTC, Elected Member or an Employee and the interests of the Community.
Conflicts Register	The register which records all conflicts assessed as an actual or perceived conflict of duty or conflict of interest.
Elected Member	Alice Springs Town Council Elected Members.
Employees	Refers to all employees of ASTC, including the CEO, Directors, casual employees, independent contractors and consultants.
Local Government Act	Northern Territory of Australia, Local Government Act, 2008
Perceived conflict	Refers to a conflict that could be perceived to exist or where a view could be formed that a conflict could exist, whether or not this is in fact the case.
Potential conflict	Refers to a conflict that could exist or arise in the future, whether or not this is in fact the case.
Register of Relevant Duties & Relevant Interests	Refers to the register of Relevant Duties and Relevant Interests established and maintained by ASTC.
Relevant Duty	<p>Refers to any duty owed by ASTC or an Elected Member, to the Community or to any other person that ASTC has determined to be relevant in accordance with this Policy.</p> <p>A duty is relevant if it has the capacity or may be perceived to have the capacity to significantly impact the ability of ASTC or the Elected Member with the relevant duty to exercise judgement, make a decision, or act in a manner that is consistent with the best interests of the Community or to discharge the duty to priority to the duties to the Community.</p>
Relevant Interest	<p>Refers to any interest, gift, emolument or benefit, whether pecuniary or non-pecuniary, directly or indirectly held by ASTC, or an Elected Member that ASTC has determined to be relevant in accordance with this Policy.</p> <p>An interest is relevant if it has the capacity or may be perceived to have the capacity to significantly impact the ability of ASTC, or the Elected Member with the relevant interest to exercised judgement, make a decision, or act in a manner that is consistent with the best interests of the Community or to discharge the duty to give priority to the interest s of the Community</p>

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Term	Definition
Relevant meetings	Meetings which may be determined by the community to be an actual, potential or perceived conflict.

3 Policy Statement

This policy documents the Conflicts Management Framework that Alice Springs Town Council (ASTC) has in place to manage conflicts that may arise in the course of its business operations.

All persons to whom this policy applies must read, understand and comply with this policy at all times. In this policy, all references to conflicts in this policy include actual, potential and perceived conflicts.

3.1 Regulatory Requirements

As a Municipal Council ASTC is required to perform its duties and exercise its powers in the best interests of the Community.

Where there is a conflict between the duties or interests of the Community and the duties and interests of others; ASTC must:

- give priority to the duties and interests of the Community over the duties and interests of other persons; and
- ensure that the duties to the Community are met despite the conflict; and
- ensure that the interests of the Community are not adversely affected by the conflict; and
- comply with Part 7.2 s73 of Local Government Act in relation to conflicts.¹

Where there is a conflict between the duties or interests of the Community and the duties or interests of any others, the Elected Member must:

- give priority to the duties to and interests of the Community over the duties and interests of others; and
- ensure that the duties to the Community are met despite the conflict; and
- ensure that the interests of the Community are not adversely affected by the conflict; and
- comply with Part 7.2 s73 of Local Government Act in relation to conflicts.²

3.2 Conflicts Management Framework

The Elected Members are ultimately responsible for the development and maintenance of the Conflicts Management Framework adopted in respect of its business operations.

Oversight of the Conflicts Management Framework has been delegated to the Risk Management and Audit Committee.

¹ Part 7.2 s73 of Northern Territory of Australia Local Government Act 2008

² Ibid.

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The following policies are in place to support the identification, assessment, mitigation, management and monitoring of conflicts in its business operations:

- Risk Management Framework
- Terms of Reference
- Fraud Protection Policy
- Conflicts Register
- Register of Relevant Duties and Relevant Interests
- Register of Meetings Disclosure

These policies and registers together with relevant business processes and controls form the ASTC Conflicts Management Framework.

3.3 Conflicts of Duty and Interest

3.3.1 Conflict of Duty

A conflict of duty may arise where an Elected Member or an employee has a duty to act in the interests of one party while at the same time having a duty to act in the interests of another party. A conflict of duty arises because an Elected Member or an employee cannot observe the duties owed to one or more parties because the duties of the party's conflict.

Examples of conflicts of duty that may arise in the course of ASTC's business operations may include:

Examples of Conflicts of Duty
A decision of an Elected Member or employee which is in the best interests of ASTC may not be in the best interests of the Community
A decision of an Elected Member or employee appointed onto an external board or committee which is in the best interests of the external board or committee may not be in the best interests of ASTC and/or the Community
An Elected Member or employee who holds directorships or positions within other organisations or businesses may be seen to have competing loyalties which may impact on their ability to give priority to the duty to ASTC and/or the Community
An Elected Member or employee is a director or officer of, or holds an executive or non-executive position with, another entity and the other entity is a supplier to, or requests funding/grant from, ASTC
An Elected Member or employee is running as a candidate in a Territory or Federal election

3.3.2 Relevant Duties

ASTC has determined that a duty will be relevant if it has the capacity, or may be perceived to have the capacity, to significantly impact the ability of the Elected Member or employee with the relevant duty, to exercise judgement, make a decision, or act, in a manner that is consistent with the best interests of ASTC or to discharge their duty to the Community.

The following duties are examples of Relevant Duties.

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Examples of Relevant Duties
An Elected Member or employee is a director or officer of, or holds an executive or non-executive position with, another entity and the other entity who may become a supplier to, or may request funding/grant from, ASTC
An Elected Member or employee is engaged, or is proposed to be engaged, as a service provider to ASTC
An Elected Member or employee is a director or officer of, or holds an executive or non-executive position with, another Government Agency
An Elected Member or employee is a director or officer of, or holds an executive or non-executive position with, the Australian Council of Trade Union
An Elected Member or employee may be running as a candidate in a Territory or Federal election

3.3.3 Conflict of Interests

A conflict of interest arises when the interests of an Elected Member or employee are inconsistent with, diverge from or compete with some or all of the interests of ASTC or its community.

Measures to manage a conflict of interest include disclosure of the existence of the conflict in ASTC, regulated disclosure documents and having an arm's length agreement on commercial terms in place for the provision of services.

The existence of a conflict of interest may create the perception that improper conduct may result, judgement or decision making may be compromised, objectivity may be impaired, bias created or that the interests of the Community could be improperly influenced. Unless managed properly, a conflict of interest may undermine the confidence of the Community in ASTC to act in their best interests at all times.

Examples of conflicts of interest that may arise in the course of the business operations of ASTC include:

Examples of Conflicts of Interest
An Elected Member or employee may personally benefit from a decision of ASTC
An Elected Member or employee may obtain inside information about an investment / project and use it to their personal benefit
The decision by an Elected Member or employee to appoint a supplier and / or engage in a partnership may be influenced by the receipt of hospitality or an associate
ASTC may seek to engage a supplier and / or engage in a partnership with whom an Elected Member or employee have a financial interest

3.3.4 Relevant Interests

ASTC have determined that an interest will be relevant if it has the capacity, or may be perceived to have the capacity to significantly impact the ability of an Elected Member or an employee holding the relevant interest, to exercise judgement, decide or act in a manner that is consistent with the best interests of the community or to discharge the duty to give priority to the interests of the community.

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Examples of Relevant Interest
Gifts or hospitality from an entity that is an existing or prospective supplier, provider of a service to ASTC or an investment held, or to be held by ASTC, and / or a partnership with ASTC
Security(ies) / investments / interests in an entity that is an existing or prospective supplier, or project to ASTC or an investment held, or to be held by ASTC
Monetary or non-monetary benefit received from an entity that is an existing or prospective supplier, or project to ASTC, or investment vehicle to ASTC
An employee who is responsible for managing the enterprise bargaining agreement negotiations
ASTC may seek to engage a supplier and / or engage in a partnership with a non-profit entity with whom an Elected Member or employee have an interest

3.4 Identifying conflicts

Conflicts may occur at different levels within the business operations of ASTC. To ensure all conflicts are captured, conflicts will be identified at a business and individual level. All conflicts must be reported to the CEO and Governance.

3.4.1 Business Level

Conflicts may be identified as they arise during the normal course of business operations of ASTC, due diligence processes or through an annual conflicts review. Any conflict identified during the normal course of business operations will be reported to Governance.

The person reporting the conflict must provide details of:

- the nature and extent of the conflict
- who is involved in the conflict
- how the conflict was identified
- whether there is, or is likely to be, any impact on the Community.

A conflicts review will be undertaken prior to the selection and appointment of a Service Provider in order to identify if conflicts arise between an Elected Member or an employee and the Service Provider. The results of this review must be reported to the Risk Management and Audit Committee.

A conflicts review will be conducted on an annual basis to identify any conflicts within the business operations of ASTC. The review will be co-ordinated by Governance and will involve Elected Members and representatives from all relevant ASTC business units.

The aim of the review is to identify all conflicts that may arise from business relationships of Elected Members or employees within the relevant ASTC business. The review must include an investigation of whether any conflicts arise from the relationship of an Elected Member or employee with an existing or prospective supplier and if any of these conflicts have the potential to have an effect on the supplier's performance of its obligations to ASTC.

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The results of the annual conflicts review will be reported to the Risk Management and Audit Committee.

3.4.2 Individual Level

Elected Members must disclose any conflicts and all Relevant Interests and Relevant Duties to the Director Corporate Services before the first meeting of a new Council. Any new conflict, Relevant Duty or Relevant Interest that arises thereafter must be disclosed to the CEO as soon as practicable after it arises and before participating in any discussion, decision or activity related to the conflict.

The Director Corporate Services must disclose all conflicts, Relevant Interests or Relevant Duties of Elected Members to Governance.

Employees must disclose any conflicts upon commencing employment to Governance. Any new conflict that arises after their appointment must be disclosed to Governance as soon as practicable after it arises.

All Elected Members and employees must complete an annual declaration attesting that they are aware of, understand and continue to meet their responsibilities under this policy and have disclosed all conflicts.

The Gifts and Benefits Policy assists in the identification of conflicts. The acceptance by Elected Members and employees of all gifts, prizes and hospitality must be recorded in the Gifts and Benefits Register.

Elected Members must disclose all conflicts, Relevant Interests and Relevant Duties in relation to any matters under consideration at an Ordinary or ASTC Committee meeting before the commencement of or during the meeting but before any discussion or decision related to the conflict.

If a conflict is declared by an Elected Member in an Ordinary or Committee meeting, the member must not be present while a question in which the member has a conflict is under consideration and must not participate in any decision on the question. The Chair must decide on the most appropriate course of action to be taken during the meeting which may also include, but is not limited to, the relevant member withdrawing from the meeting for one or more agenda items, or being unable to receive any information or reports on the matter.

An Elected Member who believes another member has an undeclared conflict is required to specify the basis of the conflict at the meeting through the Chair for resolution. If a member believes the Chair has an undeclared conflict, they are required to specify the basis of the conflict at or before the meeting, through the CEO, for resolution.

All conflicts identified in ASTC meetings must be reported to Governance.

3.5 Assessing Conflicts

Governance will assess all identified conflicts to determine whether it is an actual, potential or perceived conflict. Governance may consult with the CEO, Director of Corporate Services, ASTC Solicitor or external consultants (including external legal advisers and/or external auditors) as required in the assessment process.

Factors to be considered when assessing whether a conflict exists include:

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- the nature of the duty or interest, including whether it is a one-off occurrence, or it is ongoing, recurring or cumulative;
- the extent to which the conflict could influence the duties owed by ASTC to the community;
- the extent to which the role giving rise to the duty could influence the duties owed by an Elected Member or employee to the community;
- the potential for the conflict to have a significant impact on ASTC compliance with its regulatory and other obligations;
- the potential of the conflict to have a significant impact on the obligation of an Elected Member or employee to give priority to the duties to and the interests of the community;
- the potential of the conflict to have a significant impact on the capacity of an Elected Member or employee to act in a manner consistent with the best interests of the community;
- the likelihood of or extent to which, the conflict may harm the quality or integrity of the, services and decision-making processes of ASTC;
- the risk to the reputation of ASTC if the conflict is not managed appropriately, effectively or adequately.

The dominant consideration in the assessment process is to ensure that:

- priority is given to the duties to, and interests of, the community over the duties and interests of other persons
- the duties to the community are met despite the conflict
- the interests of the community are not adversely affected by the conflict
- ASTC complies with its obligations under the *Local Government Act 2008*.

3.6 Managing Conflicts

ASTC will use three methods for managing identified conflicts:

- avoidance
- control measures
- disclosure

It is often not possible to avoid certain conflicts altogether. If a conflict cannot be avoided it must be managed. Many conflicts can be managed effectively by a combination of control measures and disclosure. The decision as to the most appropriate and effective way for the conflict to be managed will be made on a case by case basis by the Director Corporate Services who may consult with the CEO, ASTC Solicitor, Governance or external consultants (legal advisers and/or external auditors) as required.

The following factors will be considered when determining which method(s) will be the most appropriate and effective to manage the conflict:

- any legal obligations in relation to the conflict
- the likelihood that, or extent to which, the conflict will impact on the obligations of ASTC to give priority to the duties to and the interests of the Community

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- whether the duties to the Community will still be met despite the conflict
- whether the interests of the Community will be adversely affected by the conflict
- the likelihood that, or extent to which, the conflict will impact on the quality or integrity of services of ASTC
- the risk to the reputation of ASTC if the conflict is not managed appropriately, effectively or adequately.

The controls and processes put into place to manage conflicts will be documented by Governance, reviewed by the Director of Corporate Services and recorded in the Conflicts Register or Register of Relevant Duties and Relevant Interests as required.

3.6.1 Avoidance

Some conflicts are likely to have such a serious impact on, or pose an unacceptable risk, to the duties of Elected Members and employees to the Community, that they will be unable to be managed through control measures or disclosure. The only way to adequately manage these conflicts will be to avoid them altogether.

In some cases, to avoid a conflict it may be necessary for the relevant person to relinquish the duty to another person, cease to be involved in the matter, dispose of their interest or cease their role with ASTC.

In circumstances where it is determined that the conflict is so acute or pervasive that it cannot be managed or is of the kind where the general law requires avoidance, the conflict must be avoided together.

Examples of conflicts which must be avoided altogether include:

- An Elected Member or employee with a substantial shareholding in an investment under consideration by the ASTC participating in and voting on the decision to acquire the investment
- A Elected Member or employee with a substantial financial interest in a potential service provider making a decision regarding the appointment of the service provider to ASTC.

Governance may provide guidance to ASTC business units and committees about conflicts including the types of conflicts that must be avoided.

To ensure that business operations are not adversely impacted by a conflict of interest, ASTC will, where appropriate and possible, maintain relationships with a number of suppliers in each field to ensure that a pool of prospective suppliers is available in the event an arrangement is unable to proceed due to the need to avoid a conflict.

3.6.2 Control measures

Many conflicts can be managed by implementing appropriate and effective control measures to mitigate or reduce the impact of the conflict. The control measures ASTC will implement include:

- using internal structures and reporting lines to ensure adequate segregation of responsibilities to minimise the extent or impact of the conflict
- restricting a person's involvement in the specific matter to which the conflict relates

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- removing persons from duties or from responsibility for deciding on a particular matter affected by the conflict
- using information barriers (ethical walls) to prevent the flow of information between conflicted parties
- periodic reviews of the operation of business units by internal or external auditors
- the relevant person abstaining from participating in matters relating to the conflict
- having arm's length agreements with appropriate service level standards in place with suppliers
- appointing an independent third party with no interest in the matter to oversee part or all of the process that deals with the matter to which the conflict relates.

3.6.3 Disclosure

Certain conflicts can be managed through appropriate disclosure. Disclosure alone will often not be sufficient to manage a conflict, however, disclosure combined with effective control measures may help ensure the conflict is adequately managed. To be effective, the disclosure provided in relation to conflicts must be:

- prominent, specific and clear so the person can understand the conflict and its potential impact
- provided before or at the time when the product or service is provided to allow the person a reasonable time to assess its effect
- refer to the specific service or product to which the conflict relates.

3.6.3.1 Meetings

At every meeting, the Chair must ask members to declare if they have a conflict. Details of each conflict disclosed, and the action taken to avoid or manage the conflict must be recorded in the minutes of the meeting. If a conflict is disclosed outside of meeting times, the conflict must be disclosed in the minutes of the next meeting.

From three (3) months prior to any election, until the election, all members must disclose all relevant meetings and the purpose of those meetings via a report to the CEO five (5) working days prior to Council's Ordinary meeting. Governance will maintain a record of these meetings in the Register of Meetings Disclosure.

3.7 Monitoring Conflicts

Governance will monitor compliance with the controls and processes in place for the on-going management of conflicts on a regular basis to ensure:

- the arrangements have been put in place
- the arrangements remain appropriate, effective and adequate to manage the conflicts
- instances of non-compliance with the controls and processes are identified.

Governance will monitor conflicts through a review of the controls and conduct assessment of the controls in place in relation to the conflicts in question and identification of any instances where the controls have not

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been adhered to. Relevant persons will be reminded of the controls and processes that have been put into place in relation to individual conflicts where required. This monitoring process will be undertaken on at least an annual basis as part of an annual conflicts review.

Where Governance consider the arrangements are inappropriate, ineffective or inadequate, the matter will be referred to the Director of Corporate Services for escalation and alternative action if required. The Director of Corporate Services may consult with the ASTC Solicitor, CEO or external consultants (including external legal advisers and/or external auditors) as required.

3.8 Registers

If a conflict is assessed as being an actual or perceived conflict it will be recorded in the Conflicts Register maintained by Governance.

If a potential conflict is identified and is assessed as being an actual or perceived conflict, the details of the conflict will be recorded in the Conflicts Register maintained by Governance. Potential conflicts will be monitored on a regular basis to determine if and when an actual or perceived conflict has arisen. The Conflicts Register will record:

- the date the conflict was identified
- a description of the conflict
- the measures to be used to manage the conflict
- how the conflict will be monitored.

The Conflicts Register will be reviewed on annual basis by Governance to ensure that all assessed conflicts are recorded and the arrangements for their management remain appropriate, effective and adequate.

The Conflicts Register will be tabled at the Risk Management and Audit Committee on an annual basis.

If a conflict of Elected Member or employee is assessed as being a Relevant Interest or Relevant Duty, Governance will record the Relevant Interest or Relevant Duty in the Register of Relevant Interests and Relevant Duties.

The Register of Relevant Interests and Relevant Duties will record:

- the date the Relevant Interest or Relevant Duty was identified
- the person to whom the Relevant Interest or Relevant duty relates
- a description of the Relevant Interest or Relevant Duty.

The Register of Relevant Interests and Relevant Duties will be reviewed on annual basis by Governance to ensure that all Relevant Interests and Relevant Duties are recorded and the arrangements for their management remain appropriate, effective and adequate.

The Register of Relevant Interests and Relevant Duties will be tabled at the Risk Management and Audit Committee on an annual basis.

The up-to-date Register of Relevant Interests and Relevant Duties will be publicly disclosed on ASTC's website.

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The Conflicts Register and the Register of Relevant Interests and Relevant Duties will be updated as required and on an annual basis after annual conflicts reviews.

3.9 Training

All Elected Members and employees will undertake training upon commencement and on an annual basis thereafter to ensure they clearly understand this policy and their obligations.

The training will cover:

- the need to identify all conflicts
- the circumstances that might give rise to a conflict
- the content and purpose of the policy
- the procedures for declaring and managing personal conflicts
- their obligations under the policy.

Training will be co-ordinated by Governance.

3.10 Consequences of Non-Compliance

Failure to appropriately disclose or manage a conflict in accordance with this policy may result in disciplinary action being taken.

In the case of an Elected Member, regulatory censure or criminal proceedings under Part 7.2 s74 of the *Local Government Act 2008* may also result.

If improper conduct is suspected this must be reported to the Independent Commissioner Against Corruption (ICAC), refer to Council's ICAC Reporting Policy.

3.11 Conflicts Management Policy Review

3.11.1 Annual Review

Governance will undertake an annual review of the ASTC Conflicts Management Policy. A review may also be undertaken if there is a change to the regulatory requirements or a material change in the business operations of ASTC. The annual review will consider:

- whether the arrangements ASTC has in place to identify, assess, manage and monitor all conflicts in its business operations are appropriate, effective and adequate;
- whether all conflicts, Relevant Duties and Relevant Interests have been identified and are being addressed in accordance with this policy;
- the level of compliance with this policy, including reporting on the Conflicts Register and the Register of Relevant Duties and Relevant Interests;
- any non-compliance with the policy, including steps taken to return to, and improve ongoing compliance; and
- whether this policy remains up-to-date and appropriate.

The results of the annual review must be reported to the ASTC Committee meeting.

4 Responsibilities

Governance is responsible for the oversight of conflicts management within the business operations of ASTC; including collection and record of conflict declarations.

The Director Corporate Services is responsible for dealing with the management of conflicts relating to ASTC, Elected Members and employees.

The CEO is accountable for dealing with the conflicts disclosed during ASTC Council and Committee meetings.

The Risk Management and Audit Committee is responsible for oversight of ASTC's Conflicts Management policy and compliance.

Governance undertake the following tasks as part of its role to oversight the management of conflicts within the business operations of ASTC:

- assessing identified conflicts;
- documenting and monitoring the controls in place to manage conflicts including Relevant Duties and Relevant Interests;
- maintaining the Conflicts Register;
- developing and maintaining the Register of Relevant Duties and Relevant Interests;
- reviewing the Conflicts Register and the Register of Relevant Duties and Relevant Interests on annual basis to verify that the controls and processes in place for the management of conflicts, Relevant Duties and Relevant Interests remain appropriate, effective and adequate;
- assisting ASTC to develop appropriate and effective controls to manage and monitor conflicts;
- maintaining records of written disclosures about conflicts;
- reporting to Risk Management and Audit Committee on an annual basis in relation to the Conflicts Register and the Register of Relevant Duties and Relevant Interests;
- reporting the results of the annual conflicts review to the Risk Management and Audit Committee;
- monitoring compliance with this Policy;
- co-ordinating training in relation to the Conflicts Management Framework and this Policy; and
- providing guidance to the ASTC business units on the management of conflicts and the types of conflicts that must be avoided.

5 Related Documents

- Local Government Act 2008
- Code of Conduct for Elected Members
- Fraud Protection Policy
- Fraud Protection PSD

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- Risk Management Framework
- Terms of Reference
- Fraud Protection Policy
- Conflicts Register
- Register of Relevant Duties and Relevant Interests
- Register of Meetings and Disclosure of Conflict
- ICAC Reporting Policy

6 Version History

Title/Version	Date	Approved by
N/A		

7 Communication and Training

Will this policy be communicated through internal communications?	Yes
Where will this policy be available?	Website and Intranet; CM
Will training needs arise from this policy? If yes, who will be responsible.	Yes, Governance co-ordinate

ⁱ Local Government Act 2008