



CONFLICT OF INTEREST POLICY

Authorised By:	CEO	Revision: 1.4
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Related documents:	Conflict of Interest Declaration Form	
Responsible Officer:	Registrar	
Review:	Executive	

Any person who requires assistance in understanding any aspect of this document should contact the Responsible Officer.

1. Overview

Conflicts of Interest occur where staff with a particular interest could be influenced, or might appear to be influenced, in the performance of their duties. Staff are required to disclose and obtain evaluation of any conflict of interest. While conflicts of interest are not wrong in themselves, and indeed cannot always be avoided, the potential for a conflict of interest exists in all aspects of college operations. It is important that staff act, and are seen to act, with integrity and are not inappropriately benefited by improperly using their position in the college.

2. Scope and Applications

This policy applies to all members of staff and affiliates of the college at all times while engaged in college business or otherwise representing the college.

3. Policy Principles

- 3.1 The college has a responsibility to ensure that its official activities and those of its staff conform to acceptable standards of integrity and good conduct. It recognises that a well-established system for identifying, declaring and managing conflicts of interest increases its public accountability and reduces the risk of corruption, misconduct and bias in its operations and decision-making processes.
- 3.2 The college also recognises that conflicts of interest are not unusual in the exercise of public responsibility, and cannot always be avoided.

- 3.3 Staff should not allow their external, personal or financial interests or their duties to any external entity to compromise their duties, obligations and responsibilities to the college.
- 3.4 All conflicts of interest, regardless of their character or level, should be immediately declared and managed by completing the [Conflict of Interest Declaration Form](#)
- 3.5 Any gifts/donations/benefits/sponsorship/hospitality or service will not be accepted by staff if it might be reasonably interpreted as intended to influence current or future behaviour or decision.
- 3.6 Where a conflict of interest occurs, the interests of the college will be balanced against the interests of the staff member. Unless exceptional circumstances exist, the balance of interests will be resolved in the college's favour.
- 3.7 Managers, when notified of a conflict of interest, will deal promptly with the conflict and put in place arrangements that protect the integrity of the staff member who has declared the interest and the college's processes and decision-making.
- 3.8 Staff have an obligation to declare and manage conflicts of interest. Failing to comply with the provision of this policy, including refusal to take any reasonable action as directed to resolve a conflict of interest may constitute misconduct or serious misconduct.

4. Areas of High Risk

There are a number of areas of college activity that are deemed high risk. These include, but are not limited to:

- 4.1 procurement processes and contracts
- 4.2 gifts, hospitality and other benefits
- 4.3 staff recruitment, selection, appointment, re-classification, termination, promotion, performance management, staff development, conditions of service, recognition and reward
- 4.4 student recruitment, selection, admission to the college
- 4.5 providing ethical or other approval to researchers for intended projects
- 4.6 issuing, or reviewing the issue of, fines or other sanctions
- 4.7 providing subsidies, financial assistance, concessions or other relief to those in need
- 4.8 making determinations or handing down judgement about individuals or disputes
- 4.9 assessment or supervision of students
- 4.10 exercising financial and other delegations

5. Procedures

5.1 When the staff member can be effectively separated from parts of the activity or process and the conflict of interest is not likely to arise frequently, the conflict of interest is considered appropriately managed where restrictions are placed on the staff member's involvement in the matter. This means: non-involvement in any critical criteria setting or decision-making role in the process concerned; refraining from taking part in any debate about the issue abstaining from voting on decision proposals; withdrawing from discussion of affected proposals and plans; having restricted access to information relating to the conflict of interest; being denied access to sensitive documents or confidential information relating to the conflict of interest.

5.2 In the case of ongoing serious conflicts of interest where ad hoc restriction of the staff member is not feasible or appropriate, the college should aim to remove the staff member, as the individual with the conflict of interest, from all duties related to the conflict of interest for as long as the conflict of interest exists. Removal includes abstaining from any formal or informal discussion about the matter and being removed from the situation where the employee may still exert, or be perceived to exert, a covert influence on decisions or actions taken in the matter.

6. Definitions

See [Global Definitions](#)

7. Communication and Training

The Academic Director, Heads of Departments and Deans of Faculties are primarily responsible for implementing the requirements of this policy.