



CONFLICT OF INTEREST POLICY

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First Approved by:	Administrative Committee		
Custodian title & e-mail address:	Director, Human Resources personnel_managers@uow.edu.au		
Author:			
Responsible Division & Unit:	Human Resources Division		
Supporting documents, procedures & forms:	Code of Practice - Research Commercial Research Policy Conflict of Interest Declaration Form Close Personal Relationships Guideline Disclosure of a Reportable Gift Form Fraud and Corruption Policy Philanthropic Fundraising, Gift Acceptance and Recognition Policy Privacy Policy Records Management Policy Secondary Employment Policy University Code of Conduct Use of the University Name in Public Statements Policy		
Relevant Legislation & External Documents:	Independent Commission Against Corruption Act 1988 (NSW) Privacy and Personal Information Protection Act 1998 (NSW) State Records Act 1998 (NSW)		
Audience:	Public		

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Contents

1	Purpose of Policy	3
2	Definitions	3
3	Application & Scope	5
4	Policy Principles	5
5	Examples of Situations in which Conflicts of Interest May Arise	5
6	Procurement	6
7	Financial Conflicts	6
8	Close Personal Relationships	7
9	Committees and Decision Making Forums	8
10	Research	8
11	Gifts	9
12	Access to Information	11
13	Public Comment	11
14	Use of University facilities and equipment	11
15	Situations which are not a Conflict of Interest	11
16	General Procedures for Dealing with Conflicts of Interest	11
17	Compliance with this Policy	13
18	Roles & Responsibilities	13
19	Version Control and Change History	14

1 Purpose of Policy

1. It is in the interests of the University, its staff and affiliates and all other members of the University community to maintain the highest possible ethical practices and standards in order to maintain public trust and confidence in the University. In order to act ethically and with integrity, all those who undertake duties and responsibilities on behalf of the University must be able to identify, and appropriately manage, conflicts of interest.
2. The objectives of this policy are to:
 - a. help staff and affiliates to identify, disclose and resolve actual, potential or perceived conflicts of interest between their individual interests and their duty or responsibilities to the University; and
 - b. articulate the University's position on conflicts of interest to staff, affiliates, students, and other members of the University Community.

2 Definitions

Word/Term	Definition (with examples if required)
Affiliates	Includes people holding University of Wollongong Honorary Awards as conferred by the University Council, including the awards of Emeritus Professor, Honorary Doctor and University Fellow; people appointed in accordance with the University's Appointment of Visiting and Honorary Academics Policy; and people engaged by the University as agency staff, contractors, volunteers and work experience students.
Benefit	Anything which provides the staff member or affiliate with a direct or indirect personal gain or the potential or perception of personal gain or gain to a third party. Such a gain need not be financial; it could be a personal or a non-financial gain. It includes the provision of material or facilities, or the support of individuals through the provision of benefits (e.g. travel or payment for overtime, entertainment, accommodation expenses etc.), a financial benefit, opportunity, information or gift.
Business Relationships	Refers to external contractual relationships, partnerships, private companies, business names or any other commercial trading activity.
Close Personal Relationship	Refers to married/de facto partners, sexual partners, near relatives or close friendships between staff, staff and students or staff and affiliates. It does not include normal acquaintances between staff, staff and students or staff and affiliates. Close personal relationships can exist or develop in person or online. See the Close Personal Relationships Guidelines for more information.
Conflict of Interest	A conflict of interest exists where there is a divergence between the individual interests of a staff member or affiliate and their professional obligation to the University, such that an independent observer might reasonably question whether the professional actions or decisions of that person are influenced by their own interests or are for their own benefit. It should be noted that enmity as



	<p>A conflict of interest exists where there is a divergence between the individual interests of a staff member or affiliate and their professional obligation to the University, such that an independent observer might reasonably question whether the professional actions or decisions of that person are influenced by their own interests or are for their own benefit. It should be noted that enmity as well as friendship can give rise to perceptions of a conflict of interest and similarly that detriment to a third party can give rise to a conflict of interest just as much as benefit to a third party. A conflict of interest includes an actual, perceived or potential conflict of interest (refer to section 5 below for details on the categories of conflicts of interest).</p>
Financial Benefit	<p>A benefit in the form of remuneration, payment or gift received by a staff member outside their ordinary remuneration. Financial benefits may include investments, ownership or directorship of any companies, consultancies, provision of goods or services, receipt of royalties or other consideration, etc.</p>
Near Relatives	<p>Refers to members of the immediate or extended family.</p>
Gift	<p>An item offered to or received by a staff member, or affiliate, in the context of their University role (not a formal gift to the University) or provided to an external party by a staff member, or affiliate, in the context of their University role, that:</p> <ul style="list-style-type: none">• has financial value;• has physical form; or• can be considered a favour. <p>The term includes but is not limited to:</p> <ul style="list-style-type: none">• Cash• Hospitality• Vouchers, or similar, which can be exchanged for goods;• Meals, tickets to sporting or entertainment events,• Chocolates;• Ties, scarves or other items of clothing;• Ornaments, ornate or precision display items (clocks, furniture, figurines, works of art and so on);• Pens or paperweights;• Accommodation, free travel, travel discounts or vouchers for personal use;• Bottles/cases of alcoholic beverages; and• Other items of enduring value (jewellery, precious metals or stones, fine art work or items containing these elements).



	<p>An item offered to or received by a staff member, or affiliate, in the context of their University role (not a formal gift to the University) or provided to an external party by a staff member, or affiliate, in the context of their University role, that:</p> <ul style="list-style-type: none">• has financial value;• has physical form; or• can be considered a favour. <p>The term includes but is not limited to:</p> <ul style="list-style-type: none">• Cash• Hospitality• Vouchers, or similar, which can be exchanged for goods;• Meals, tickets to sporting or entertainment events,• Chocolates;• Ties, scarves or other items of clothing;• Ornaments, ornate or precision display items (clocks, furniture, figurines, works of art and so on);• Pens or paperweights;• Accommodation, free travel, travel discounts or vouchers for personal use;• Bottles/cases of alcoholic beverages; and• Other items of enduring value (jewellery, precious metals or stones, fine art work or items containing these elements).• Gifts which have significant cultural or historical value include items from the local region or elsewhere and may include:<ol style="list-style-type: none">a. cultural gifts such as artworks, rare books, artefacts, antiquities, scientific specimens and instruments); and/orb. items of historic significance to the University including records (any document or source of information compiled, recorded or stored in written form or on film, or by electronic process or in any other manner or by any other means, but not State Records).
Register of Reportable Gifts	A register used to record all giving and receiving of reportable gifts by or to staff or affiliates.
Reportable Gifts	Refers to any gifts offered to the same recipient, with a single or cumulative annual value in excess of \$299. This includes gifts as defined by this policy such as <u>valuable items of property, whether of a personal nature or otherwise deemed</u>



	Refers to any gifts offered to the same recipient, with a single or cumulative annual value in excess of \$299. This includes gifts as defined by this policy such as valuable items of property, whether of a personal nature or otherwise deemed reportable by the Australian Tax Office and normally incurring Fringe Benefits Tax.
Secondary Employment	Secondary employment means any employment with an organisation other than the University and includes self-employment, independent contracting or consulting or employment by a family company.
Staff Member	All people employed by the University including conjoint appointments, whether on continuing, permanent, fixed term, casual or cadet or traineeship basis.
Student	A person registered for a course at the University of Wollongong.

3 Application & Scope

1. This Policy applies to all staff and affiliates of the University.
2. This Policy does not apply to students except where they are also staff or affiliates of the University, and only for those duties the student performs as a staff member or affiliate.
3. This Policy does not apply to staff of controlled entities of the University of Wollongong as those organisations are expected to have their policies on this issue in place.

4 Policy Principles

1. The University Code of Conduct refers to the general standards of conduct expected of University staff and affiliates. University staff and affiliates are expected to behave in good faith and avoid actual, potential or perceived conflicts between their private interests and the interests of the University.
2. Staff and affiliates carrying out University activities and functions have a responsibility to declare and manage conflicts of interest as they arise.

5 Categories of conflicts of interest

Category	Definition	Example
Potential	A potential conflict of interest arises where a staff member or affiliate has an interest or obligation, whether personal or involving a third party, which has the capacity to develop a conflict with the staff member or affiliate's duties or responsibilities at the University	A staff member has a pre-existing personal relationship with a student of the University



Perceived	A perceived conflict of interest exists where it could reasonably be perceived that a competing interest could improperly influence the decisions or activities of a staff member or affiliate (whether or not that is actually the case)	A staff member acts as a consultant for a business which is sponsoring research undertaken by the staff member for the University
Actual	An actual conflict of interest involves a direct or real conflict between a staff member or affiliate's duties and responsibilities to the University and a competing interest or obligation, whether personal or involving a third party	A staff member assesses a tender submitted by a business in which the staff member has a financial interest

6 Examples of Situations in which Conflicts of Interest May Arise

1. Without limiting the possible circumstances the following are examples of areas which may give rise to a conflict of interest:
 - a. decisions regarding suppliers, customers and other persons in respect of the selection and/or ongoing dealings related to doing or seeking to do business with the University;
 - b. business or close personal relationships with competitors or businesses operating in the same area as the University or one of its units;
 - c. decisions regarding appointment, promotion or other personnel decisions relating to staff members;
 - d. decisions regarding, and dealings with, potential staff members;
 - e. holding paid or unpaid directorships, executive positions, shareholdings or ownership of other companies, organisations or businesses;
 - f. close personal relationships (including sexual relationships) with another staff member, affiliate, student or other person (see the Close Personal Relationships Guidelines);
 - g. decisions regarding students including assessments, scholarships, prizes, examination results and other matters relating to a student's academic progress or record;
 - h. a researcher's affiliation with or financial involvement in any organisation or entity with a direct interest in the research or the provision of materials for research they are undertaking;

- i. acceptance of benefits (gifts, entertainment, travel, accommodation expenses etc);
 - j. acceptance of hospitality;
 - k. access to University documents and information obtained in the course of employment;
 - l. secondary employment whether paid or unpaid of any kind (see the Secondary Employment Policy); including with other companies, organisations or businesses;
 - m. ownership of intellectual property;
 - n. membership of an organisation that comes into serious competition or conflict with the University;
 - o. requests for public comment including public speaking, comments on radio or television, opinions expressed in letters to newspapers or in books, journals or notices; or
 - p. use of University facilities and equipment for personal benefit or the benefit of a third party.
2. Some of the most significant risk areas for conflicts of interest are discussed in more detail in Sections 7 – 14 below.

7 Procurement

1. Staff engaged in procurement on behalf of the university, who make decisions regarding suppliers, customers and other persons in respect of the selection and/or ongoing dealings related to doing or seeking to do business with the University should seek to avoid conflicts of interest (whether actual, potential or perceived) associated with their decisions or should declare and manage them appropriately in accordance with section 16 (Procedures for Dealing with Conflicts of Interest) below .
2. Staff engaged in procurement must not accept gifts from suppliers or those who may benefit from their decisions, with the exception of hospitality provided in the normal course of business and in line with normal business standards i.e. not excessive or extravagant (see section 11(4) for more detail on this) .
3. Financial delegates must not approve payments to themselves, or to a spouse or near relative. In such cases, claims must be signed by a more senior financial delegate (see the Delegations of Authority Policy). A delegate must not approve claims for payment from a more senior staff member within the same cost centre.

8 Financial Conflicts

1. Where a business or close personal relationship with a competitor or business operating in the same area as the University or one of its units exists, staff must declare their conflict of interest and exclude themselves from decision-making which may be perceived as inappropriate
2. Financial conflict of interest might arise in the following situations:
 - a. where a staff member who has a financial interest in a company holds a position within the University in which they could influence, or could be perceived to influence the University to do something which favours that company;

- b. within the awarding of contracts by the University to a company; where a staff member holds a directorship of a company which is in a position to exert significant influence over the University;
 - c. where the University is providing services to an organisation in which a staff member has an interest;
 - d. where a staff member is required to perform an audit on an operation in which they have a personal interest; or
 - e. where a staff member owns or holds a directorship, executive position or shareholding in a company, organisation or business.
3. Staff members must be impartial and be seen to be impartial in the performance of these duties, and must not use information obtained in the course of their work for their own personal benefit. They must not disclose such information to a third party except where consent has been obtained or there is a legal or professional duty to disclose.
4. If a staff member has a financial interest in a company or any other business venture and is in a position to influence business arrangements between that company and the University, such interests must be declared to the Executive Dean or Director and recorded in accordance with Section 16 of this policy.
5. Secondary employment of any kind must be declared (see the Secondary Employment Policy);
6. Authorised staff members shall select and deal with suppliers, customers and other persons doing or seeking to do business with the University in a completely impartial manner based always on the best interests of the University. A staff member shall not conduct business on behalf of the University with a member of their family, near relatives or a business entity with which the staff member or a member of their family is associated except where such dealings have been disclosed and specific approval and written authorisation have been obtained.
7. Similarly, a staff member shall not divert business of the University away from another supplier, customer or other person to a member of their family or business entity with which the staff member or a member of their family is associated except where such dealings have been disclosed and specific approval and written authorisation have been obtained from the Executive Dean or Director.

9 Close Personal Relationships

1. Close personal relationships may exist or develop between staff members, between a staff member and a student, between a staff member and an affiliate or between a staff member or affiliate and another person related to the role of the staff member or affiliate at the University (for example, a supplier or an applicant for a vacancy in the same work area).
2. The existence of such close personal relationships may give rise to actual, potential or perceived conflicts of interest or other consequences such as actual or perceived corrupt or fraudulent conduct.
3. Staff members are required to disclose close personal relationships on the Conflict of Interest Declaration Form in accordance with Section 16 of this Policy. Affiliates are strongly encouraged to disclose such relationships to their supervisor or appropriate senior officer to

ensure appropriate management strategies are put in place to mitigate risk to the University and the parties involved.

4. Management strategies that may be put in place include but are not limited to ensuring that:
 - a. one party is not the direct line supervisor of the other;
 - b. one party is not involved in procedures leading to the appointment or promotion of the other party or in any other procedure relating to the conditions of appointment such as the classification of that person's position or the granting of leave;
 - c. one party does not have access to any personal files relating to the other party;
 - d. the relationship between the parties does not affect, adversely or otherwise, the interests of third or other parties.
 - e. duties are reorganised to minimise contact, for example, ensuring that one party is not tutoring, supervising, assessing, providing pastoral care, employing, promoting, performance evaluating or professionally responsible for administering activities in which the other party is involved.
5. An existing close personal relationship does not of itself present grounds for refusing employment, promotion, transfer or access to other benefits.
6. More detailed information is available in the Close Personal Relationships Guidelines.

10 Committees and Decision Making Forums

1. As a member of a University working party, committee or board, staff members and affiliates must declare the nature, character and extent of any existing actual, potential or perceived conflicts of interest when their role commences.
2. Additionally, staff members and affiliates must disclose actual, potential or perceived conflicts of interest that arise from the ongoing business under consideration of the committee, working party or board that they are a member of.
3. In the case of recruitment Selection Committees, members are required to formally declare that they do/do not have a conflict of interest once candidates are known, by completing a 'Conflict of Interest – Selection Committees' form (see the Recruitment and Selection Policy for more detail).
4. If in doubt, it is best to acknowledge a possible conflict of interest.
5. When such a conflict of interest is disclosed, the Chair (subject to the views of the Committee or Forum) will determine how the conflict will be managed, giving consideration to how to ensure fair and equitable processes throughout. Management may include but is not limited to:
 - a. asking the staff member or affiliate to leave while the item of business is discussed;
 - b. asking the staff member or affiliate to abstain from voting and or discussion;
 - c. allow the staff member or affiliate to participate in the discussion but withdraw from the meeting before the vote or abstain from voting;
 - d. allow the staff member or affiliate to stay but not participate in the debate;



- e. allow the staff member or affiliate to stay with full rights to debate and vote; or
 - f. replacing the staff member or affiliate with another (particularly in the case of recruitment Selection Committees to ensure that all applicants are judged by a panel of the same size and comprising the same members).
6. Where the Chair of the working group, committee or board is unsure as to how a perceived or actual conflict of interest should be managed, they may seek advice from the Governance Unit.
 7. Where there is a conflict of interest declared in relation to a particular issue, future papers on that issue may not be made available to the staff member or affiliate concerned.
 8. All declarations of interest shall be recorded via a Conflict of Interest declaration Form or should be minuted, along with any ensuing action and filed in accordance with the requirements of clause 16.8.

11 Research

1. A researcher's affiliation with or financial involvement in any organisation or entity with a direct interest in the research or the provision of materials for research may result in a conflict of interest.
2. A researcher, whether student or staff, must make a full disclosure of any potential conflict of interest in research. Potential conflicts of interest may include, but are not limited to any affiliation with, or financial involvement in, any organisation or entity which:
 - a. has a direct interest in the subject matter or materials of the researcher;
 - b. provides direct financial support, such as sponsorship, for a project involving the researcher; or
 - c. provides indirect benefits such as the provision of materials or facilities for a project involving the researcher or the support of the researcher such as by provision of travel or accommodation expenses to attend conferences.
3. Such disclosure must cover any situation in which the potential conflict of interest may, or may be perceived to affect any decision regarding other people.
4. University researchers are required to disclose any potential conflict of interest in research to journal editors, readers of published work, and to external bodies from which funds are sought.
5. University researchers are required to disclose at the time of reporting or proposing research (for example in a grant application), any potential conflict of interest that has the potential to influence research and investigations, publication and media reports, or grant applications.
6. Disclosure of a potential conflict of interest must be made at the time of application for University funds for a project. The Deputy Vice Chancellor (Research and Innovation) shall, upon advice, make a determination regarding the conflict of interest.
7. The Deputy Vice-Chancellor (Research and Innovation) must be informed of any disclosure of a potential conflict of interest in research as soon as reasonably practicable. University researchers must comply with any direction made by the Deputy Vice-Chancellor (Research and Innovation) in relation to a potential conflict of interest in research.

8. In addition, University researchers must comply with the Consultancy Expenses Guidelines. A researcher's affiliation with or financial involvement in any organisation or entity with a direct interest in the research or the provision of materials for research may result in a conflict of interest.

12 Gifts

1. This section relates to gifts provided by the University to staff members or external parties and gifts received by staff members. For gifts given to the University of Wollongong, see the Philanthropic Fundraising, Gift Acceptance and Recognition Policy.
2. No staff member should accept a gift or benefit if it could be construed by others to be intended as an inducement or reward which might place the staff member under an obligation, or cause them to act in an improper manner. It is not acceptable for a staff member to give or receive a gift or favour that may:
 - a. Compromise his or her judgement;
 - b. Create a conflict of interest or a perception of a conflict of interest;
 - c. Damage relationships with others; or
 - d. Indicate any favouritism or prejudice towards a person or group of people.
3. No staff member involved in the procurement of goods or services for the University may accept a gift, beyond normal hospitality, from any outside source that does or is soliciting business from the University, regardless of value.
4. Staff may accept hospitality including food, beverages, accommodation or hospitality provided in the normal course of business or while attending formal functions. This may include business lunches, business dinners or accommodation which is strictly related to business meetings or events. Hospitality is expected to be consistent with industry practice, that is, business dinners should not be extravagant or hospitality excessive compared to that provided in normal business. Hospitality beyond normal business practice such as invitations to attend sporting events or other venues associated with entertainment rather than hospitality will normally be considered as a gift.
5. Under no circumstances should a gift be solicited or a gift of money, lottery ticket or a loan be accepted. Additionally, staff members must not receive gifts for members of their family.
6. Staff may accept trophies, certificates or promotional items of minor value.
7. Staff members shall not accept benefits or other favours of a character which go beyond common courtesies consistent with ethical and accepted business practices for themselves or anyone else from any organisation, person or entity which does, or seeks to do, business with the University
8. Generally, it is acceptable for staff to give or receive token gifts, of a personal nature (but not money or loans as per clause 12.5 above), with an accumulated annual value of \$299 or less, providing they do not have cultural or historical significance to the University.
9. Where the value of the gift is unclear or where not accepting the gift is likely to cause offence, staff should seek advice from their Head of Unit.
10. Further guidance on what constitutes a gift with cultural or historical significance may be sought from the Chief Operating Officer.



11. In rare circumstances, where receipt of a gift which is valued in excess of \$299 or a gift with cultural or historical significance, has been approved by the delegated authority, the gift will be the property of the University. For official gifts made to the University, refer to the Philanthropic Fundraising, Gift Acceptance and Fundraising Policy.
12. At the discretion of the delegated authority, a gift may be allocated to a staff member. Where gifts incur Fringe Benefits Tax, the recipient will pay any relevant tax.
13. All gifts, accepted or not, must be disclosed immediately by the intended receiver to their Head of Unit.
14. All gifts offered to an individual by an external party, whether accepted or not, singular or cumulative (from the same party), including hospitality received outside normal business practice, with an annual estimated value of more than \$299, must be disclosed by the intended recipient, within 14 days of the gift being offered, by completing and submitting a Reportable Gift Form to the Human Resources Director.
15. In the case of gifts given by a staff member or affiliate, it is the responsibility of the authorising party to disclose reportable gifts using the Reportable Gift Form, to the Human Resources Director.
16. A Register of Reportable Gifts made by or received by staff members or affiliates will be established and maintained by the Human Resources Division.
17. The Reportable Gift Form and the Register of Reportable Gifts will specify the:
 - a. particulars and estimated value of the gift;
 - b. date and approving authority;
 - c. identity of the person or body receiving the gift;
 - d. relevant file references;
 - e. in the case of reportable gifts given, the date and approving authority for the expenditure; and
 - f. in the case of reportable gifts received the present location of the gift or the application of the proceeds.
18. All employees must complete an annual Conflict of Interest Form to confirm that they have reported any gifts with an individual or cumulative value (from the same party) in excess of \$299 per annum.

13 Access to Information

1. Where staff members have access to official University documents and information obtained in the course of their employment, they need to be aware of and maintain confidentiality and privacy of that information in order to protect the individuals concerned and to ensure the efficient operation of the University.
2. In general staff members should only disclose University information when required to do so by law, when the need arises as part of their normal duties and when called upon to give evidence in court or where the information has been officially approved for release. This restriction does not apply to University information which has been published and is therefore in the public domain.

14 Public Comment

1. In some circumstances, public comment by a member of the University could raise questions of conflict of interest. In such cases, members of the University are referred to the Use of the University Name in Public Statements Policy.

15 Use of University facilities and equipment

1. Staff members are expected to use University facilities efficiently, carefully and honestly. Such resources should not be used for personal benefit or the benefit of a third party. Personal use should be minimal. Guidelines for the use of facilities and equipment in relation to consultancies are contained in the Commercial Research Policy.

16 Situations which are not a Conflict of Interest

1. There are a number of circumstances that do not constitute a conflict of interest under this policy, including:
 - a. membership of other organisations where there is no possible benefit or perception of benefit;
 - b. union representation or membership; or
 - c. University-approved collaboration with other organisations.

17 General Procedures for Dealing with Conflicts of Interest

1. A [Conflict of Interest Declaration Form](#) is available for use by staff and affiliates to disclose information about actual, potential or perceived conflicts of interest including secondary employment, financial, business and family interests, gifts, close personal relationships and other conflicts. Staff will be asked to update and return the form on an annual basis. While this provides a general notification of interests, staff members are still required to assess whether a conflict of interest or the potential for a perceived conflict of interest exists in each individual situation as they arise.
2. Where a conflict of interest or the potential for a perceived conflict of interest arises, the staff member must follow the procedure outlined below:
 - 2.1. Actual, potential or perceived conflicts of interest must be disclosed by the staff member to the staff member's Executive Dean or Director and to the Chair of any relevant committee. The report must be made immediately and in the case of any delay a valid explanation must be provided.
 - 2.2. Staff members who are uncertain whether or not they are placed in a situation where a potential or actual conflict of interest exists should seek advice from:
 - a. the Director, Human Resources in relation to staffing or Director, Financial Operations for finance matters; or
 - b. the Deputy Vice-Chancellor (Research and Innovation) in relation to research matters; or
 - c. the Director, Student Services Division in relation to student matters; or



- d. a Deputy Vice-Chancellor or the Chief Operating Officer in respect of all other matters.
3. The person to whom the disclosure is made, on consideration of all relevant information, may determine that:
 - a. the potential for a conflict of interest of the staff member is remote and requires no further action other than to record that the matter has been reviewed; or
 - b. the staff member's situation presents a conflict of interest and that conflict must be resolved.
4. If the staff member and Executive Dean/Director disagree, either about the presence of a conflict or about its appropriate resolution, the matter must be referred to the:
 - a. Chief Operating Officer for Professional Services Staff; or
 - b. A Deputy Vice-Chancellor for Academic Staff.
5. Once an assessment has been made, the Executive Dean or Director must immediately notify the staff member of their decision.
6. The report of the conflict of interest, the supervisor's assessment and the resolution must be in writing and placed on the staff member's personnel file. The report must be provided to the staff member and include any comment that the staff member wishes to be recorded.
7. Actions to resolve or eliminate any conflict of interest are to be implemented immediately. These may include:
 - a. requiring the staff member to take action to eliminate the conflict; or
 - b. disqualifying the staff member from the process to which the conflict relates; or
 - c. reorganising the duties of the staff member so as to remove the conflict of interest; or
 - d. putting in place additional processes to ensure the impartiality of the staff member in the performance of their duties and notifying the staff member of these processes by confidential minute.
8. Staff members who are authorised to continue performing their normal duties must immediately report any change in circumstances, which could affect that authorisation, to their Executive Dean or Director. Once notified, the Executive Dean or Director should review the situation according to the procedures set out above.
9. All information regarding conflicts of interest or perceived conflicts of interest is confidential and must only be disclosed to staff with delegated authority for dealing with and recording such matters. It is legitimate for those involved in resolving a matter to seek advice and/or assistance from people with relevant expertise as nominated in this policy.
10. The University shall take all necessary steps to ensure the confidentiality of information relating to conflicts of interest or perceived conflicts of interest.
11. Any person with a complaint about a staff member acting in breach of this policy may raise the matter with the Chief Operating Officer or, alternatively, where appropriate, report the matter under a relevant University procedure for the making of a complaint or protected disclosure.

12. Where a complaint is made by any person that a staff member has breached this policy, the complaint shall, at the discretion of the Vice-Chancellor, be investigated.

18 Compliance with this Policy

1. All staff and affiliates are required to comply with this policy.
2. A staff member may be directed to provide information regarding potential or actual conflicts of interest and failure to do so may be regarded as a breach of this policy.
3. Any alleged breaches of this Policy will be dealt with in accordance with the applicable University policy document, enterprise agreement, industrial instrument or contract in accordance with the principles of natural justice.
4. Where a breach of this policy has been found to have occurred:
 - a. Staff may have their employment with the University terminated.
 - b. Affiliates may have action taken against them which may include termination or non-renewal of their contract or appointment with the University.
5. The University treats all complaints seriously and makes every effort to expeditiously investigate complaints in accordance with the University's policy documents. Where there is no relevant process for dealing with an alleged breach of this Policy, the University will take steps to ensure the matter is properly considered and, if proven, that appropriate action is taken.

19 Roles & Responsibilities

1. Staff members and affiliates are responsible for identifying and reporting any conflicts of interest they may become aware of and to take action to address situations in which a conflict of interest could arise, or perceivably arise, as soon as the conflict of interest is identified, by implementing the procedures in this policy.
2. The University is responsible for communicating the requirements of this policy to staff on a regular basis.
3. The University will communicate the contents of this policy to all staff, affiliates and to students and other clients of the University. This will be achieved by:
 - a. publication of the policy and procedures on the University website;
 - b. inclusion in University Staff Induction Program;
 - c. inclusion in relevant staff training programs;
 - d. circulation to all Head of Schools/Areas for distribution to all staff and affiliates; and
 - e. circulation to relevant University stakeholder.



20 Version Control and Change History

Version Control	Date Effective	Approved By	Amendment
1	15 July 2003	Administrative Committee	New Policy
2	13 July 2004	Administrative Committee	Minor Amendment to section 7.13
3	6 May 2009	Vice-Principal (Administration)	Migrated to UOW Policy Template as per Policy Directory Refresh
4	9 March 2010	Vice-Principal (Administration)	Future review date identified in accordance with Standard on UOW Policy
5	26 August 2010	Vice-Principal (Administration)	Updated to reflect divisional name change from Personnel Services to Human Resources Division
6	19 October 2010	Vice-Principal (Administration)	Review by Policy Custodian. No changes required and new review date set.
7	11 September 2013	Chief Administrative Officer	Updated to reflect title change from VP(A) to CAO.
8	12 November 2013	Chief Administrative Officer	Minor amendment to section 7.8 to include Director, Financial Operations
9	28 July 2017	Vice-Chancellor	<p>Insertion of an Application and Scope section.</p> <p>Reference to 'Dean' updated to 'Executive Dean'.</p> <p>Academic Registrar replaced with Director, Student Services Division. Deputy Vice-Chancellor (Research) updated to DVC (Research and Innovation). References to Senior Deputy Vice-Chancellor updated.</p> <p>Reportable gifts increased from up to \$100 to gifts valued over \$299.</p> <p>Gifts of cultural or historical value or exceeding \$299, if accepted, become the property of the University.</p> <p>Gift provisions for staff involved in procurement tightened.</p>



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10	31 July 2019	Vice-Chancellor	<p>Amendments following <i>KPMG Conflict of Interests Internal Audit</i> (October 2018): insertion of a new section 5 (‘Categories of conflicts of interest’) and amendment of</p>



		Vice-Chancellor	Amendments following <i>KPMG Conflict of Interests Internal Audit</i> (October 2018): insertion of a new section 5 ('Categories of conflicts of interest') and amendment of section 9 ('Committees and Decision-Making Forums') to include mention of a new process in which recruitment Selection Committee members are required to formally declare that they do/do not have a conflict of interest once candidates are known.
11	1 May 2020	Chief Operating Officer	Administrative amendment to update Senior Executive titles.