

Conflicts of Interest Policy

1. PREAMBLE

- 1.1. Members of the University community have a duty of loyalty to the University, and it is important that they are able to recognise, declare and manage situations involving actual, potential or perceived conflicts of interest.
- 1.2. Members of the University community have the obligation to protect the reputation of the University by maintaining high ethical standards, fairness and integrity in all dealings.
- 1.3. In an environment of collegiality, members of the University community have the obligation to protect the reputation of the University by maintaining high ethical standards, fairness and integrity in all dealings.

2. PURPOSE

- 2.1. This document establishes the principles by which University staff and members of the University community are to judge whether a matter represents a conflict of interest, and the responsibilities they hold to the University in relation to such conflicts.
- 2.2. This document does not cover the procedure for addressing such conflicts, which is covered in the [Conflicts of Interest Procedures](#).

3. SCOPE

- 3.1. All staff of the University and other members of the University community including students, contractor and adjuncts must be aware of their obligations to recognise, declare and manage situations involving actual, potential or perceived conflicts of interest.

4. POLICY PRINCIPLES

4.1. Conflict of Interest

- a. Members of the University Community must avoid, mitigate and declare all conflicts of interest.
- b. A conflict of interest occurs when the private interests of a member of the University community may influence, compromise or conflict with the conduct of that member of the University community in relation to their activities at the University.
- c. A conflict of interest occurs when a member of the University community is being influenced by a foreign party to act in the interests of that party.
- d. Conflicts of interest can be real, potential or perceived and can involve the financial or non-financial interests of a member of the University community; as well as the financial and non-financial interests of a person in a close personal relationship with a member of the University community.

4.2. Responsibility

- a. In all interactions with members of the University community and other individuals (internal, external and foreign), a member of the University community has an obligation to:



- i. Always observe the highest standard of business ethics;
 - ii. Not improperly use their position to gain a personal benefit;
 - iii. Not improperly use their position to gain a benefit for another party whether internal, external or foreign;
 - iv. Avoid, as far as possible, ethical, legal, financial and other conflicts of interest;
 - v. Ensure that personal activities and interests do not conflict with their obligations to the University; and
 - vi. Recognise and declare situations to a supervisor or other authorised person that might reasonably give rise to, or be perceived as giving rise to a conflict of interest.
- b. Where a conflict of interest does arise, a member of the University community must disclose such a conflict in accordance with the Conflicts of Interest Procedures and act in accordance with any advice received from either a supervisor or other authorised person.
- c. All staff members have an individual responsibility to raise any suspicion, allegation or report of bribery or improper conduct in accordance with the [Fraud and Corruption Control Policy](#) and [Whistleblower Reporting \(Improper Conduct\) Procedure](#).

5. NON-COMPLIANCE

- 5.1. Non-compliance with Governance Documents is considered a breach of the [Code of Conduct](#) and is treated seriously by the University. Reports of concerns about non-compliance will be managed in accordance with the applicable disciplinary procedures
- 5.2. All staff members have an individual responsibility to raise any suspicion, allegation or report of fraud or corruption in accordance with the Fraud and Corruption Control Governance Framework, [Fraud and Corruption Control Policy](#) and [Whistleblower reporting \(Improper Conduct\) Procedures](#).

RELATED AND SUPPORTING DOCUMENTS

Legislation	ARC Guidelines for Disclosure of Interests and Confidentiality (Commonwealth) NHMRC Guideline Identifying and managing and Conflicts of Interest (Commonwealth)
Policy	CDU and Union Enterprise Agreement Code of Conduct Academic Freedom and Freedom of Speech Policy External Work Policy Fraud and Corruption Control Policy Gifts and Benefits Policy Hospitality Policy
Procedures	Conflicts of Interest Procedures Employee - Grievance Procedures Whistleblowers Reporting (Improper Conduct) Procedure
Definitions	CDU Glossary



GOVERNANCE

Responsible Executive	University Secretary	
Implementation Officer	University Secretary	
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Approving authority	Council	
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DOCUMENT HISTORY AND VERSION CONTROL

Version	Date Approved	Approved by	Brief Description
1.00	23 Feb 2011	Vice-Chancellor	Creation of original document and upload to CDU website
1.01	9 Jan 2012	Governance	Update hyperlinks and position titles according to new organisational chart.
1.02	30 Jan 2013	Governance	<ul style="list-style-type: none"> • Conversion of document to current template and update hyperlinks. • Minor changes to wording, grammar and formatting • Assigned document number
2.00	13 Nov 2013	Governance	<ul style="list-style-type: none"> • Review document and included definition of University community and objective
3.00	12 Dec 2017	Vice Chancellor	<ul style="list-style-type: none"> • Conducted major review of both the Conflicts of Interest Policy and Procedure • Removed examples from both the Conflicts of Interest Policy and Procedure and created a COI webpage • Amended ... or of commitment to conflict of interest and explained the difference • Added definitions for duty of loyalty and supervisor • Amended definition for senior manager – removed COO & DCOO, added Provost, staff member and university community • Replaced all reference to staff members with members of the University community or individual as this document applies to staff members, students, consultants, contractors and external appointees of Council, boards and committees of the University • Replaced actual with real conflicts.. • Replaced Code of Ethics with Code of Conduct
4.00	24 Jun 2021	Council	Minor changes of wording, reviewed by Australian Government Solicitors for compliance