

Conflict of Interest Procedure



1 Purpose

To outline the process for identifying, declaring, and managing a perceived, potential or actual Conflict of Interest.

2 Scope

This Procedure applies to all University Members, excluding University Members of the University Council who are not Employees, (hereafter referred to as 'Members') when participating in activities related to the University.

Refer to the Council Conflict of Interest Policy and Procedure for matters related to the University Council.

3 Procedure Overview

This Procedure informs University Members of the process for identifying, declaring, and managing perceived, potential or actual Conflicts of Interest. This Procedure ensures that the conduct of University Members meets the highest ethical standards and is aligned with the University's values of respect, integrity, and excellence.

Identifying, declaring, and managing Conflicts of Interest supports University Members in demonstrating impartiality and integrity when executing their University Responsibilities and Official Duties.

4 Procedures

4.1 Identifying a Conflict of Interest

A Conflict of Interest involves a conflict between a Member's personal interests or benefits, Private Interests either Pecuniary or Non-Pecuniary, and their University responsibilities, whereby the private or personal interests could improperly influence the performance of their Official Duties.

While it is not possible to set out a definitive list of instances, conflicts may arise through:

- conflict of roles - where individuals have more than one official role at the University or an official role or participation in a different organisation, it may be difficult to keep their

roles separate;

- Private Interests - a Conflict of Interest may be Pecuniary or Non-Pecuniary and can arise from avoiding personal losses as well as gaining personal advantage;
- personal relationships - Members of the University Community should not be involved in Decisions or processes affecting the employment or academic administration of a person with whom the Member has a current or previous personal relationship. These relationships may include a spouse, children, siblings or cousins, relations by marriage, Close Relatives, close friendships, or sexual relationships; and
- financial relationships - Employees must not be involved in Decisions affecting the employment or academic administration of a person with whom they have a commercial relationship or where a personal financial interest exists;
- personal benefits - a Conflict of Interest may occur where a Member of the University Community receives a benefit which is, or may be perceived as, an incentive or inducement to perform or not to perform an official function or duty; or
- University facilities, resources and/or equipment are not to be used for personal benefit or the benefit of a third party. Additionally, the access to, or use of, University documents and Information obtained in the course of University duties is not to be used for personal benefit or the benefit of a third party; or
- Foreign Interference - refer to the National Security Policy.

4.1.1 Personal relationships

Members of the University Community must not be involved in Decisions or processes relating to persons whom they have a close personal relationship with. This includes, but not limited to, decision-making and processes regarding:

1. the Purchasing of goods or services for the University where a Member of the University Community involved in the decision-making or process has a relationship with the Supplier or an Employee of the Supplier;
2. the recruitment, appointment, promotion or other personnel where personal relationships exists with one or more party/ies;
3. Students where a personal association exists, including assessments, scholarships, placements, prizes, examination results and other matters relating to a Student's Academic Progress or records;
4. the supervision or oversight of another Employee, Student or other person associated with or contracted to the University where a close personal relationship exists; or

5. business Decisions or processes where there is a close personal relationship with competitors or businesses operating in the same areas as the University.

4.1.2 Gifts and benefits

Members of the University Community must not accept any Gift or Benefit which could create a Conflict of Interest or be perceived to create such a conflict. Acceptance of Gifts or Benefits (financial or otherwise), including conference attendance, entertainment, travel, accommodation expenses or hospitality must be consistent with, and Declared in accordance with the Gifts and Benefits Procedure.

4.1.3 Research, Commercialisation, and Intellectual Property

Members of the University Community involved in Research have obligations under the Australian Code for the Responsible Conduct of Research, which include responsibilities to Disclose and manage Conflicts of Interest. As such, University Community Members involved in Research must also refer to the University's Research Code of Conduct Policy and Intellectual Property Policy.

Members of the University Community involved in Research must not allow their Private Interests to interfere or perceive to interfere with Research and Commercialisation activities.

Research Conflicts of Interest can occur when an independent observer may reasonably conclude that a Researcher's other interests may unduly influence the design, conduct, outcome, or reporting of the Research. This includes financial, personal, familial, professional, and organisational interests.

Commercialisation Conflicts of Interest can occur when an independent observer may reasonably conclude that the personal benefits a Researcher makes from Commercialisation activities may unduly influence their University duties and cause them to not act in the best interest of the University.

Researchers have a responsibility to identify and assess Conflicts of Interest in relation to Research and Commercialisation activities.

When determining whether a Conflict of Interest may exist in a Research or Commercialisation activity, Researchers should consider how their Private Interests might impact on their University duties and how those interests might be perceived to independent observers.

Factors to consider include (but are not limited to):

- direct payments, such as salary, consultancy payments, speaking fees, panel memberships;
- indirect payments, such as funding of travel, accommodation, professional development, hospitality;

- payments to support Research, such as funding from an industry or interest group;
- company shares or options;
- royalties;
- directorships;
- scholarships;
- operational or infrastructure support;
- whether there is a future expectation of a benefit, for example, proceeds from the sale of IP arising from a project or the promise of shares in a spin-off company;
- board membership (paid or unpaid) or other affiliation with an organisation that could stand to benefit from or be affected by the Research;
- personal or social relationships and current and past professional relationships, where relevant; and
- recent employment with, or role in, organisations with financial links or affiliations with industry groups that could stand to benefit from or be affected by the Research.

Members of the University Community are obligated to identify, Disclose, and manage situations involving Conflicts of Interest in accordance with this Procedure or the Council Conflict of Interest Policy and Procedure.

4.2 Declaring a Conflict of Interest

A Member must Declare any perceived, potential, or actual Conflict of Interest.

The Member must make a Declaration to their Supervisor using the Declaration of Conflict of Interest Form as soon as practicable after identifying a perceived, potential or actual Conflict of Interest.

In their annual performance review and as part of annual compliance training, a Member is required to certify that all perceived, potential or actual Conflicts of Interest have been Declared as required.

Where a Member believes that a Conflict of Interest may exist relating to another Member, they are encouraged to discuss the matter with their immediate Supervisor. Members may also report the Conflict of Interest through the Public Interest Disclosure Policy.

4.2.1 Assessing and recording Declarations

Failure to comply with this Policy or Policy Instrument may be considered as misconduct and the provisions of the relevant Policy or Procedure applied. A hard copy of this electronic document is uncontrolled and may not be current as UniSQ the University regularly reviews and updates its Policies and Policy Instruments. The latest controlled version can be found in the UniSQ's [Policy and Procedure Library](#).

Supervisors will review each Declaration and, where appropriate, work with the Member to develop a Conflict of Interest Management Strategy to address the conflict.

The Director (Integrity and Professional Conduct), in conjunction with the People Portfolio, will maintain a Conflicts of Interests Register, together with any developed Conflict of Interest Management Strategies, where the conflicts are of a material or ongoing nature.

4.2.2 Committee conflicts

A Member who is a University committee member who has an interest in a matter before that committee must Declare that interest to the committee. This Declaration must be recorded in the minutes of the committee meeting at which the Declaration was made.

Members must also Declare all committee and board memberships and directorships held in public or private companies or organisations in accordance with the Outside Work Procedure.

4.2.3 Changes to Declared Conflicts of Interest

A Member must submit a revised Conflict of Interest Declaration Form where a Conflict of Interest previously Declared has been or is materially altered.

4.3 Managing a Conflict of Interest

Once a conflict is identified and Declared, a Conflict of Interest Management Strategy must be developed by the Member and their Supervisor to appropriately manage or resolve the conflict.

The University has adopted the Register, Restrict, Recruit, Remove, Relinquish, and Resign Model for the development of Conflict of Interest Management Strategies.

Examples of these strategies are as follows:

Register	All Conflicts of Interest are to be registered with the University in accordance with the Declaration of a Conflict of Interest section above.
Restrict	Used in circumstances where the Conflict of Interest is not likely to arise frequently, the University Member can be effectively separated from parts of the activity or process. Strategies include non-involvement in any critical criteria setting or decision-making role in the process concerned, withdrawing from discussions about the issue, restricting access to relevant Information/systems including the removal of access to sensitive documents.
Recruit	Used in circumstances where it is not appropriate for the University Member to remove themselves from a decision-making process where a Conflict of Interest exists. A common strategy includes recruiting an independent third-party/s into the management and decision-making processes to balance the influence of the Member of the University

	Community who cannot remove themselves entirely from the process.
Remove	Used in circumstances where the restriction or recruitment is not appropriate or feasible. Removal from the matter can involve removal from any involvement in the matter including any related discussions or situations where the University Member may have or perceive to have an influence on the Decision or actions. This may include the transferring the University Member to another project or the University Member being removed as a Supervisor for a particular person.
Relinquish	Used in circumstances for significant Conflicts of Interest where the above strategies are not appropriate or effective. The University Member may relinquish the Private Interest entirely by liquidating the Private Interest in an arms-length transaction, divesting themselves or of withdrawing support for the Private Interest or assigning the conflicting interest to a genuinely 'blind trust' or 'blind management' arrangement.
Resign	Used as a last resort for serious Conflicts of Interest where the suggested strategies above are not effective or have not been agreed to by either party.

Where interests may affect collaborative Research with other institutions or organisations, the management strategies should be considered when negotiating the relevant collaborative Research agreement.

When considering appropriate management strategies to manage the Conflict of Interest it is important the discloser, in consultation with the relevant approver, identifies any risks that arise from the conflict and what can be put in place to mitigate those risks.

The completed Declaration, which includes the Management Strategy, must be approved by the next level Delegate of the Member declaring the Conflict of Interest as per the Delegations outlined in section 4.7 of this Procedure. The Declaration is then added to the Conflict of Interest Register and stored in a confidential and secure location. The Management Strategy will be reviewed annually at the time of the Member's performance review or on an as needs basis.

4.4 Failure to Declare a Conflict of Interest

Any person who has knowledge that a Conflict of Interest may exist that has not been appropriately Disclosed, should discuss the situation with a relevant Supervisor, Head of Organisational Unit, relevant Executive Leader, or People Portfolio representative. Such reports, where applicable, will be considered under the University's Fraud and Corruption Management Policy, Corrupt Conduct Reporting Policy and the Public Interest Disclosures Policy.

Any person who is concerned that a Research related or Research Commercialisation Conflict of Interest has not been Disclosed or managed in accordance with University policy and procedures, or who wishes to lodge a Complaint, should follow the process set out in the

University's Research Code of Conduct: Management of Potential Breaches Procedure.

Examples of departures from appropriate management of Conflicts of Interest include (but are not limited to):

- failing to Disclose a relevant interest in a timely manner; and
- failing to abide by any Decisions as to the management of a Conflict of Interest.

For Employees, a failure to comply with this Procedure (and superordinate Policy) may constitute a breach of the University's Code of Conduct Policy and may be dealt with as misconduct or serious misconduct in accordance with the relevant clauses in the Enterprise Agreement or instrument of appointment.

Other Members of the University Community who do not comply with this Procedure (and superordinate Policy) may have their association with the University terminated and rights of access to University services, facilities, or infrastructure revoked.

Some breaches of this Procedure (and superordinate Policy) may also have consequences for Employees and other Members of the University Community under criminal or civil provisions of the general law.

University Members should recognise a Conflict of Interest to ensure there can be no perception of them or the University receiving improper advantage.

The University trusts University Members will take reasonable steps to:

- refrain from making Decisions in matters involving an actual conflict;
- not use their University position, resources, or Information obtained in the context of their employment, for private gain or for the private gain of others with whom they have a personal relationship;
- follow the Gifts and Benefits Procedure;
- follow the Outside Work Procedure, which includes both Private and University Sponsored Outside Employment and Consultancies as well as Committee, Board or Tribunal Memberships;
- determine if their private or personal interests conflict, or could reasonably be perceived, or have the potential to conflict with their official duties;
- follow the Council Conflict of Interest Policy and Procedure (for Council Members);
- Declare an interest that could compromise the performance of their duties or conflict with

the University's interest;

- deal with a Conflict of Interest in the public interest in accordance with a management strategy approved with their Supervisor;
- Disclose a Conflict of Interest when necessary; and
- when acting as a Supervisor, proactively work with Members to identify perceived, actual or potential Conflicts of Interest, including identifying, approving, documenting and implementing a Management Strategy.

Executive leaders may designate positions where it is necessary for a University Member to complete a Statement of Private Interests and/or Internal Control Certification, to properly and impartially discharge their official duties.

Authority to approve the management response for Conflict of Interest ultimately rests with the relevant executive leader.

4.5 Privacy and confidentiality

All Information relating to Conflicts of Interest will be treated as confidential.

Notifications regarding Employee Conflicts of Interest will be stored on the Employee's personnel file as well as on the Conflict of Interest Register.

Any Personal Information collected, stored, used or Disclosed under this Procedure will be managed in accordance with the University's Privacy Policy.

Information will only be released if required by Regulatory Compliance Instruments.

4.6 Responsibilities

Delegates, Managers and Supervisors are responsible for:

- ensuring that all Members have completed their mandatory onboarding and annual compliance training and are able to attend and participate in education opportunities relating to the need to identify, Declare and manage perceived, potential or actual Conflicts of Interest as these opportunities become available;
- ensuring that all Members are aware of their obligations in relation to the relevant Policy Instruments and to provide advice on appropriate methods to ensure compliance with this Procedure;
- developing a Conflict of Interest Management Strategy in consultation with Members, where appropriate. The strategy may include a number of options to effectively manage

perceived, potential or actual Conflicts of Interest;

- discussing perceived, potential or actual Conflict of Interest matters raised with them in relation to other areas of the University with the Director (Integrity and Professional Conduct); and
- ensuring all matters are treated confidentially and in accordance with the University's Privacy Policy and the Public Interest Disclosure Policy.

Members must:

- identify, Declare, and manage perceived, potential and actual Conflicts of Interest and must Disclose these to their Supervisor or Delegate, as appropriate. Where the Conflict of Interest involves the Member's Supervisor, the declaration is to be made to the Supervisor's Manager; and
- develop a Conflict of Interest Management Strategy in consultation with their Manager or Supervisor, as appropriate, once a Conflict of Interest is identified and Declared. This strategy may include several options to effectively manage perceived, potential, or actual Conflicts of Interest.

4.7 Delegations

Position	Delegation
Category 1 Delegate	Approve Conflict of Interest Management Strategy completed by a Category 2 Delegate
Category 2 Delegate	Approve Conflict of Interest Management Strategy completed by a Category 3 Delegate
Category 3 Delegate	<ul style="list-style-type: none">• Approve Conflict of Interest Management Strategy completed by a Category 4 Delegate• Approve Conflict of Interest Management Strategy completed by an Employee that does not hold a Delegation

5 References

Nil.

6 Schedules

This procedure must be read in conjunction with its subordinate schedules as provided in the table below.

7 Procedure Information

Accountable Officer	Chief People Officer
Responsible Officer	Chief People Officer
Policy Type	University Procedure
Policy Suite	Conflict of Interest Policy
Subordinate Schedules	
Approved Date	2/12/2024
Effective Date	5/12/2024
Review Date	5/12/2029
Relevant Legislation	Corporations Act 2001 Enterprise Agreement Integrity Act 2009 Public Sector Ethics Act 1994
Policy Exceptions	Policy Exceptions Register
Related Policies	Code of Conduct Policy Corrupt Conduct Reporting Policy Council Conflict of Interest Policy and Procedure Delegations Policy Financial Management and Accountability Policy Flexible Work and Working Arrangements Policy Fraud and Corruption Management Policy

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	<p>Intellectual Property Policy</p> <p>National Security Policy</p> <p>Performance Planning and Review Policy</p> <p>Privacy Policy</p> <p>Professional Services Policy</p> <p>Public Interest Disclosure Policy</p> <p>Records and Information Management Policy</p> <p>Recruitment, Selection and Appointment Policy</p> <p>Research Code of Conduct Policy</p> <p>Student Academic Integrity Policy</p> <p>Student Grievance Resolution Policy</p>
Related Procedures	<p>Employee Complaints Procedure</p> <p>Gifts and Benefits Procedure</p> <p>National Security Procedure (under development)</p> <p>Research Code of Conduct: Management of Potential Breaches Procedure</p> <p>Sanctions and Export Controls Procedure (under development)</p>
Related forms, publications and websites	<p>Conflict of Interest Declaration Form</p> <p>Employee Conflicts of Interest Knowledge Article (under development)</p> <p>Internal Control Certification (under development)</p> <p>Register, Restrict, Recruit, Remove, Relinquish, and Resign Model (under development)</p> <p>Statement of Private Interests (under development)</p>
Definitions	<p>Terms defined in the Definitions Dictionary</p> <p>Academic Progress</p> <p>Describes the status of a Student's progress towards successful</p>

completion of their coursework for each Study Period and towards completion of their program within the maximum given timeframe. Students who are successfully progressing through their studies would not be assigned to any of the Academic Progress stages outlined in the Student Academic Progress Procedure.

[Close Relative](#)

Close relatives for this purpose are spouse/partner, parent, mother-in-law, father-in-law, sister, brother, sister-in-law, brother-in-law, daughter, son, stepdaughter, stepson, stepfather, stepmother, stepsister, stepbrother, half-sister, half-brother, grandparent, granddaughter, grandson, son-in-law, daughter-in-law, any other person approved by the Vice-Chancellor or delegated officer.

[Commercialisation](#)

The application, publication, development, use, assignment, licensing, sub-licensing, franchising, exploitation, sale or other utilisation of Intellectual Property for the purpose of directly or indirectly generating financial or other social or cultural gains. Commercialise and Commercialising have corresponding meanings.

[Complaint](#)

A Complaint is an “expression of dissatisfaction made to or about the University, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required”.

[Conflict of Interest](#)

If a University Member has an interest that conflicts or may conflict with the discharge of the University Member's duties the University Member should Declare the nature of the interest and the conflict to the University Member's Supervisor as soon as practicable after the relevant facts come to the University Member's knowledge and must not take action or further action relating to a matter that is or may be affected by the conflict until authorised. An Executive Leader may direct a University Member to resolve a conflict or possible conflict between an interest of the University Member and the University Member's duties. A reference to an interest or to a Conflict of Interest is a reference to those matters within their ordinary meaning under the general law, and, in relation to an interest, the definition in the Acts Interpretation Act 1954, Schedule 1, does not apply. A Conflict of Interest will arise when a University Member's Private Interests conflict with their duty to the University or to serve the public interest as a University Member. The risk of having a conflict of interest increases

where a University Member's responsibilities include the authority to make decisions. A conflict of interest may be potential, perceived or actual - when a University Member is in a role where future decision making may be influenced by their Private Interests if a certain condition is fulfilled, they have a potential conflict of interest; a perceived conflict of interest arises where it appears that decisions a University Member make in the course of their University employment may be influenced by their Private Interests, whether or not this is in fact the case; an actual conflict of interest exists where a University Member's actions could be unduly, improperly or excessively influenced by their Private Interests. Serious misconduct can occur when a conflict of interest is concealed, understated, mismanaged or abused.

[Council](#)

Council means the governing body, the University of Southern Queensland Council.

[Decision](#)

A determination made by an Employee, contractor or other authorised delegate in the course of their duties on behalf of the University.

[Delegate \(noun\)](#)

Delegate (noun) means the officer, Employee or committee of the University to whom, or to which, a delegation of authority has been made under this Policy.

[Delegation](#)

A formal authority or power granted to Council members, Employees and Council committees to make Decisions on behalf of the University.

[Director \(Integrity and Professional Conduct\)](#)

The officer of the University who bears this title or similar title, who has responsibility in the area of professional standards and integrity, including a person acting in that position.

[Employee](#)

A person employed by the University and whose conditions of employment are covered by the Enterprise Agreement and includes persons employed on a continuing, fixed term or casual basis. Employees also include senior Employees whose conditions of

employment are covered by a written agreement or contract with the University.

[Enterprise Agreement](#)

University of Southern Queensland Enterprise Agreement 2023-2026.

[Gift and/or Benefit](#)

A Gift and/or Benefit is: the transfer of property or other benefit without recompense or for a consideration substantially less than full consideration; or a loan of property made on a permanent, or an indefinite, basis; anything of value offered in the course of employment other than normal employment entitlements that is received or given by a University Member when they are acting in their official capacity. Gifts and/or benefits include tangible items of lasting value and intangible items of no lasting value (including hospitality).

[Information](#)

Any collection of data that is processed, analysed, interpreted, organised, classified or communicated in order to serve a useful purpose, present facts or represent knowledge in any medium or form. This includes presentation in electronic (digital), print, audio, video, image, graphical, cartographic, physical sample, textual or numerical form.

[Intellectual Property](#)

The result of an individual's intellectual endeavours that is capable of being protected by legal rights. Examples include, but are not limited to: inventions and discoveries in relation to new products and processes that can be protected by a patent; Copyright in Teaching Materials; other works in which Copyright subsists including literary works (including computer programs), dramatic works, musical works, artistic works, films, sound recordings, broadcasts, published editions and certain types of performances; industrial designs, which protect the shape, configuration, pattern or ornamentation of a product, that is, what gives a product a unique appearance; plant breeders' rights, which protect varieties of plants and trees; trademarks, which protect the branding, reputation and goodwill of products and services; circuit layout rights, which protect the layout plans or designs of electronic components in integrated circuits, computer chips, or semi-conductors used in personal computers and computer-reliant equipment; and trade secrets and know-how, that is, knowledge about products, processes, and inventions and discoveries: prior to the time they are incorporated into a publication or become the subject of a patent or

design application; or which are never made the subject of an application for Intellectual Property registration.

[Non-Pecuniary Interest](#)

Does not involve a financial component but may arise from personal or family relationship or involvement in sporting, social or cultural activities. It can include but is not limited to any favour or prejudice from friendship, animosity or other personal involvement that could lead to actual or potential bias in the exercise of judgement or discretion or the making of a Decision.

[Pecuniary Interest](#)

Involves an actual or potential financial gain or loss. For example:
Existing proprietary, contractual and employment rights
Existing liabilities / obligations
Interests created by, in, or under a decision or transaction effected by the University
Indirect economic relationships (share price value)
Expectancies (future economic interests, employment opportunities etc.)

[Personal Information](#)

Is information or an opinion, including information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

[Policy Instrument](#)

A Policy Instrument refers to an instrument that is governed by the Policy framework. These include Policies, Procedures and Schedules.

[Purchasing](#)

The method for acquiring the Goods and/or Services required. This can include credit cards, purchase orders and/or leasing arrangements.

[Regulatory Compliance Instrument](#)

An external compliance instrument provided by legislation, regulation, standards, statutes or rules, including subordinate instruments.

[Research](#)

Research is the creation of new knowledge and/or the use of existing knowledge in a new and creative way to generate new concepts, methodologies, inventions and understandings. This could include the synthesis and analysis of previous research to the extent that it is new and creative.

[Researcher](#)

Any person/s involved in Research Activities at, or on behalf of the University. This includes, but is not limited to Employees, Students, visiting scholars, research partners, research affiliates, holders of Honorary or Adjunct positions.

[Student](#)

A person who is enrolled in a UniSQ Upskill Course or who is admitted to an Award Program or Non-Award Program offered by the University and is: currently enrolled in one or more Courses or study units; or not currently enrolled but is on an approved Leave of Absence or whose admission has not been cancelled.

[Supplier](#)

An organisation known to be capable of supplying the required Goods and/or Services.

[University](#)

The term 'University' or 'UniSQ' means the University of Southern Queensland.

[University Community](#)

Means all Students and Employees of the University, persons officially associated with the University, former Students and alumni at the University, as well as invitees, visitors and guests.

[University Members](#)

Persons who include: Employees of the University whose conditions of employment are covered by the UniSQ Enterprise Agreement whether full time or fractional, continuing, fixed-term or casual, including senior Employees whose conditions of employment are covered by a written agreement or contract with the University; members of the University Council and University Committees; visiting, honorary and adjunct appointees; volunteers who contribute to University activities or who act on behalf of the University; and individuals who are granted access to University facilities or who are

engaged in providing services to the University, such as contractors or consultants, where applicable.

Definitions that relate to this procedure only

Conflict of Interest Register

A register is held by the People Portfolio of Conflict of Interest Declarations where a conflict is of a material or ongoing nature.

Declare or Declaration

A written statement made by a University Member of the relevant personal interests, or the interests of individuals closely related to the person, when those interests may give rise to a Conflict of Interest. A Declaration involves registering details of the Conflict of Interest, reporting the Conflict of Interest to their Supervisor, and developing an agreed approach to manage the conflict.

Disclose or Disclosure

To make known to others that an interest exists that may affect the carrying out of official duties when a University Member is required to participate in a discussion or decision about a matter. A record of the Disclosure should be created and retained.

Private Interest

Anything that can influence, or be reasonably perceived to influence, an individual. This may include direct interests, such as an individual's own personal, family, professional or business interests, as well as indirect interests, such as the personal, family, professional or business interests of a Related Person. Private Interests may be Non-Pecuniary Interests or Pecuniary Interests.

Related Person

Includes anyone who is part of a University Member's close circle of family and friends. Close members are those persons whose interests may be expected to influence, or be influenced by, the University Member's duties, and include but are not limited to:

- children and spouse or domestic partner;
- children of their spouse or domestic partner; and
- dependents of the University Member or the University Member's spouse or domestic partner.

	<p>A Related Person is not restricted to family relationships, and may extend to anyone whose affairs are closely linked to those of the University Member, where there are some type of direct or indirect beneficial relationship.</p> <p>Supervisor</p> <p>Any person responsible for leading the activities of a University Member. In the context of this policy, a Supervisor includes Employees at any classification level or title who have responsibilities for: leading, managing or supervising, a business process, work team/s, or individual Employees, or; directing the activities of a University Member. e.g. The chair of a Recruitment Panel is a Supervisor of a recruitment selection process.</p>
Keywords	Corrupt conduct, conflict of interest, conflict, Col, declaration, disclosure, actual, perceived, potential
Record No	16/964PL