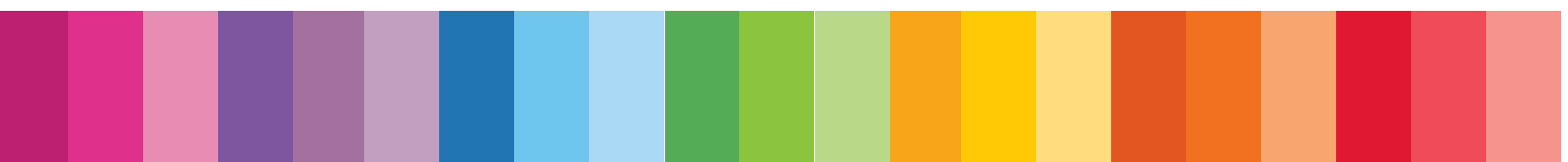




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Conflict of Interest Policy

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1. BACKGROUND

City of Ryde is committed to preventing adverse consequences that can arise from conflicts of interest, as well as the appearance of favouritism, undue influence or impropriety. A conflict of interest exists when a reasonable person might perceive that your personal interests could be favoured or have influence over your public duties.

2. SCOPE

This policy applies to all staff and councillors, designated persons and external appointees, committee members and external council advisors, council consultants, contractors and outsourced service providers including individuals and companies performing work for City of Ryde (COR / Council). Where the word staff or employee is used it applies equally to all of the above.

Conflicts of Interest to be reported, managed and registered in a central register (maintained by Business Assurance and Governance) include all actual, potential or perceived possible conflicts. These include disclosures of interests, disclosures or reports of conflicts of interest, secondary employment requests and approvals, and any disclosures or declarations of gifts, benefits, bribes, personal interests, breaches, electoral expenditure, political donations, public interest, pecuniary interest or related party disclosures or any other disclosures/declarations as may arise.

3. OBJECTIVE

This policy sets standards and provides guidance on how to manage conflicts of interest in an ethical manner. It outlines the expected standards of behaviour and declarations required in relation to actual, potential or perceived conflicts of interest. It ensures all possible conflicts are reported, assessed and managed.

4. POLICY IN BRIEF

This policy is to be read in conjunction to, and as being complemented by, City of Ryde's:

- Code of Conduct
- Fraud and Corruption Prevention Policy
- Gifts and Benefits Policy
- Secondary and Multiple Employment Policy

and any other policy in operation at Council.

As per the definitions in those policies, the term conflict of interest:

- Applies to your own interests and (by extension) those of your family members.
- Includes pecuniary and non-pecuniary conflicts of interest.
- Can be actual, possible or perceived

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You must:

- disclose all conflicts of interests in accordance with this policy
- co-operate with your manager / other colleagues / reporting officer to ensure conflicts of interest are properly managed
- not allow your personal interests to affect the way you carry out your duties
- protect the reputation of City of Ryde by considering how a conflict of interest situation might be perceived
- update your personal interests and disclosures as and when they change, to enable City of Ryde to maintain an up-to-date conflict of interest register.

5. POLICY IN DETAIL

5.1 What is a Conflict of Interest?

A conflict of interest exists when a reasonable person might perceive that personal interests could be favoured or have influence over public duties or official or work responsibilities.

A conflict of interest is a situation where an individual or company covered by this Policy could be influenced, or be seen to be influenced, by a personal interest in carrying out their official duties or responsibilities. A conflict of interest can arise from avoiding losses or gaining advantage for self or others (whether financial or otherwise) and can be actual, potential or perceived.

- An **actual conflict of interest** involves a conflict between an individual's duties and responsibilities in serving Council's interest, and the individual's existing private interests.
- A **potential conflict of interest** arises where an individual has private interests that could conflict with their official duties in the future.
- A **perceived conflict of interest** exists where it appears, or where it is or could be perceived, that an individual's private interests could improperly influence the performance of their official duties, whether or not this is in fact the case.

5.2 About conflicts of interest

Managing conflicts of interest is important because the public rightly expect that staff and officials of City of Ryde, or their close connections and associates, should never be in a position to obtain personal benefits. This reflects the view that public office is held for the public good, not the purposes or benefits of the officeholder. In addition to the requirements of your position description, your public duties include a requirement to act in accordance with the policies, procedures, codes and values of Council. Therefore, any conflict of interest that is concealed or mismanaged can damage the reputation of Council.

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Note the following important points:

- In most cases, only you will be aware of the potential for a conflict of interest. Consequently, the onus is on you to identify and declare any conflicts in accordance with this policy.
- It can be challenging to objectively assess whether your own personal interests are in conflict with your work duties. Therefore, you should err on the side of caution and make a disclosure if you are unsure about whether you have a conflict of interest.

For more details, refer to **Appendix 1: Additional Information – personal interests that can conflict with public duties.**

5.3 Avoiding conflicts of interest

While having a conflict of interest is not necessarily wrong, you should avoid placing yourself in conflicting situations where it is practical to do so. This can be achieved by avoiding:

- assignments and tasks that could conflict with your private interests (which you should discuss with your manager)
- investments or financial arrangements that could relate to your duties
- commercial dealings with suppliers and other stakeholders that are not on a normal arms length basis
- situations in which professional relationships could develop into personal relationships
- social media activity that could be perceived as compromising your impartiality.

5.4 Disclosure

As soon as possible, staff and others must accurately disclose all conflicts of interest in writing to your manager by completing the Conflict of Interest Declaration Form.

In addition to the requirements in this policy, you should also comply with the requirements of COR to disclose conflicts of interest during processes relating to procurement, recruitment, project management and any and all other matters as appropriate. If you are in doubt about whether you need to disclose a matter, speak to your manager for advice.

You must make a new or revised disclosure if there is a significant change in the nature of your conflict of interest. If you change roles or report to a different manager, you should apprise your new manager of the details of your conflict of interest and any plan of management.

Councillors and, where applicable, all other persons, must declare and manage any conflicts of interest in matters being considered at meetings of council and its committees. Part 4 of the Model Code establishes the requirements for the disclosure of pecuniary interests by councillors and designated persons. This includes disclosures of interests in written returns (returns of interests) and disclosures of pecuniary interests at meetings.

Any failure to disclose a conflict of interest, or conduct which favours a personal interest, is a breach of this policy.

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5.5 Managing a conflict of interest

In your role at Council, the interests of Council and the public interest should be put ahead of personal interests. Once your conflict of interest has been disclosed in accordance with this policy you must:

- together with your manager or, in the case of Councillors, the CEO and in the case of the CEO, the Mayor, discuss and document how your conflict of interest will be managed. This should be done by completing the **Conflict of Interest Declaration Form**
- adhere to the agreed, documented approach to managing your conflict of interest
- promptly notify your manager in writing of any significant changes to your conflict of interest and update the document with your manager or prepare a new document with your manager
- regardless of any disclosure that you have made, never favour your personal interests
- the obligation to disclose any new matters as they arise is a continuous obligation.

For additional information, refer to **Appendix 2: Additional information – options for managing conflicts of interest.**

If you are a manager (or the person Authorising the **Conflict of Interest Declaration Form**), you must:

- ensure you review the conflicts of interest register for all existing conflicts of any new staff that are assigned to you if/when you take on new team members
- ensure any new disclosures of interest are in writing and recorded in the conflicts of interest register by completing a **Conflict of Interest Declaration Form.**
- if necessary, make further enquiries to verify the accuracy and completeness of the disclosure. The disclosure may be understated or lack sufficient detail. Managers may make enquiries and seek documents to satisfy themselves that the disclosure is accurate.
- together with the affected employee/contractor, discuss and document how the conflict of interest will be managed by completing a **Conflict of Interest Declaration Form.** Options for managing conflicts of interest are set out in Appendix 2
- monitor the situation to ensure compliance with the agreed management plan.

Managers, including contract and project managers, should also be aware that the responsibilities set out above also apply to contractors, service providers and other entities acting on behalf of City of Ryde that disclose conflicts of interest.

Managers also need to disclose their own conflicts of interest, which includes conflicts of interest in relation to any new staff that are assigned to you if/when you take on new team members.

Note: It is then still the declarer's responsibility to disclose and conflict of interest to a new manager or person acting in a supervisory role.

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If you are the CEO or their delegate, managing conflicts of interest of Councillors, you must:

- ensure you review the conflicts of interest register for all existing conflicts of councillors
- ensure any new disclosures of interest are in writing and recorded in the conflicts of interest register by completing a **Conflict of Interest Declaration Form**.
- if necessary, make further enquiries to verify the accuracy and completeness of the disclosure. The disclosure may be understated or lack sufficient detail. You may make enquiries and seek documents to satisfy yourself that the disclosure is accurate.
- together with the affected councillor, discuss and document how the conflict of interest will be managed by completing a **Conflict of Interest Declaration Form**. Options for managing conflicts of interest are set out in Appendix 2.
- monitor the situation to ensure compliance with the agreed management plan.

If you are the Mayor, managing conflicts of interest of the CEO, you must:

- ensure you review the conflicts of interest register for all existing conflicts of the CEO
- ensure any new disclosures of interest are in writing and recorded in the conflicts of interest register by completing a **Conflict of Interest Declaration Form**.
- if necessary, make further enquiries to verify the accuracy and completeness of the disclosure. The disclosure may be understated or lack sufficient detail. You may make enquiries and seek documents to satisfy yourself that the disclosure is accurate.
- together with the CEO, discuss and document how the conflict of interest will be managed by completing a **Conflict of Interest Declaration Form**. Options for managing conflicts of interest are set out elsewhere in this policy
- monitor the situation to ensure compliance with the agreed management plan.

For additional information, refer to **Appendix 2: Additional information – options for managing conflicts of interest**.

5.6 Managing privacy

Conflicts of interest can involve the disclosure of information that may be private in nature, such as details about personal finances and relationships. While you must disclose this information, if required, personal information should only be shared with staff on a genuine need-to-know basis.

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6. FURTHER POLICY REQUIREMENTS

The following additional policy requirements apply:

6.1 Dealing with yourself or your family

You must not process transactions, make decisions or be involved in workplace duties that involve your personal affairs as a citizen interacting with City of Ryde, without the written authorisation of your manager/CEO/Mayor. The same requirement applies to matters involving members of your immediate family. In addition, you may not self-approve transactions, procedures or policies that provide you with a personal financial benefit (for example, payroll, overtime, leave, expense reimbursement or staff benefits).

For more details, refer to **Appendix 1: Additional Information – personal interests that can conflict with public duties**.

6.2 Personal dealings with suppliers and service providers

You should avoid making personal purchases from the suppliers and service providers of City of Ryde unless they are on an arm's-length basis. Seeking discounts or favourable terms from suppliers for personal purchases could create a conflict of interest. If you are in any doubt, seek advice from your manager.

6.3 Secondary employment or business

You may not engage in any paid secondary employment or paid business activity without prior notification of such activity in accordance with the **City of Ryde's Secondary and Multiple Employment Policy**. Refer to that policy for details.

6.4 Disclosure of personal interests

Under the **Model Code of Conduct for Local Councils in NSW (the Model Code of Conduct)**, certain council officials are required to disclose their personal interests in publicly available returns of interests.

All employees and contractors, even if not a senior executive or designated person, are encouraged to pre-empt any conflict of interest or perceived conflict of interest by declaring any personal interest as outlined in **Appendix I - Personal interests that can conflict with public duties**.

Disclosure of Interests Returns (including nil disclosure) are required annually by Councillors, and Committee members and Council staff identified as designated persons, under the **Local Government Act 1993, Regulations 2005 and the Model Code of Conduct**. They are tabled at Council Meetings and made publicly available on Council's website as the returns are prescribed as open access information under the **Government Information (Public Access) (GIPA) Act**. Council will apply the public interest test to each return and where an overriding public interest against disclosure is found, that information will be redacted (Eg. residential street number and signatures may be redacted if there is, on

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balance, an over-riding public interest against disclosure).

A register of these returns will be incorporated into the Central Register and the nature of the information redacted will also be recorded.

For further information please see the [OLG's Model Code of Conduct – A Guide to Completing Returns of Interest](#) and [IPC's Guideline 1](#)

6.5 Gifts, Benefits and Bribes including Hospitality

Refer to City of Ryde's ***Gifts and Benefits Policy***.

6.6 Charity Work / Unpaid Voluntary Work or Involvement

As with paid work, individuals engaged in such activities must ensure this work does not impact adversely on their work for Council and they must not use their COR position / work to obtain advantage or benefit. Actual, potential or perceived conflicts of interest must also be considered in relation to such work and must be declared.

6.7 Post-Separation Employment

Post-separation employment refers to a public official or former council employee resigning and obtaining subsequent employment outside Council. The corruption concern is the need to ensure that public officials who are preparing to leave, or thinking of leaving public employment, continue to make decisions in the public interest and do not allow their decisions to be influenced by an emerging private interest connected to future employment. Former officials or employees who have already moved out of the sector may also seek to improperly use contacts or confidential information gained during their public employment in their new position. Actual, potential or perceived conflicts of interest must be considered in relation to such work and must be avoided and/or declared.

6.8 Electoral Expenditure and Political Donations

Disclosures must be lodged annually for electoral expenditure and half-yearly for political donations. Disclosures must be made by each political party, local councillor and mayor, registered candidate, group, and third-party campaigner.

Disclosures must be lodged even if no political donations were made or received during the half-yearly period and/or no electoral expenditure was incurred during the annual period.

Further information is available from the ***NSW Electoral Commission*** website at www.elections.nsw.gov.au

Forms for making disclosures are available on <https://www.elections.nsw.gov.au/About-us/Forms-and-Fact-sheets/Forms/Disclosure-forms>

Publicly available disclosures will also be listed in ***COR's Conflict of Interest Central Register***.

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6.9 Public Interest Disclosures (PID)

Protection is offered to staff and officials in making public interest disclosures per the **Public Interest Disclosures Act 2022**. Any PIDs will also be listed in **COR's Conflict of Interest Central Register**. Please see City of Ryde's **PID Internal Reporting Policy**

6.10 Volunteer Emergency Services Work

Staff engaged in such activities, particularly activities involving heavy physical work or long hours, must ensure that this does not adversely impact on their fitness for work. Where required, managers and staff may consider emergency leave provisions to ensure they present fit for work. Actual, potential or perceived conflicts of interest must also be considered in relation to such work and must be declared.

7. ROLES AND RESPONSIBILITIES

Each of the following has specific assigned responsibilities under this policy:

- Chief Executive Officer
- Manager Business Assurance and Governance
- Councillors and Committee Members
- All employees, contractors and volunteers
- All managers
- Reporting officers
- Governance and Risk Officer

7.1 Chief Executive Officer

This role is responsible for:

- the general conduct and management of City of Ryde in accordance with the
- Code of Conduct and Council's values
- reporting reasonably suspected corrupt conduct to the **NSW Independent Commission Against Corruption** and/or the police.

7.2 Manager Business Assurance and Governance

This role is responsible for:

- maintaining an overall framework of internal control
- providing written and verbal guidance on this policy, where required
- auditing compliance with this policy
- receiving and investigating reports of breaches of this policy.

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7.3 Councillors and Committee Members

All councillors and committee members are responsible for:

- placing the interests of City of Ryde and the public interest ahead of personal interests
- disclosing all conflicts of interest (and, where relevant, disclosing personal interests) in accordance with this policy
- adhering to the agreed, documented approach to managing conflicts of interest
- reporting reasonably suspected breaches of this policy
- adhering to the **Code of Conduct** as applicable.

7.4 Employees, Contractors and Volunteers

All employees, contractors and volunteers are responsible for:

- placing the interests of City of Ryde and the public interest ahead of personal interests
- disclosing all conflicts of interest (and, where relevant, disclosing personal interests) in accordance with this policy
- adhering to the agreed, documented approach to managing conflicts of interest
- reporting reasonably suspected breaches of this policy
- adhering to the **Code of Conduct** and all related policy and legislation etc as applicable as applicable.

7.5 Managers / Supervisors

All managers are responsible for:

- ensuring that their staff, including consultants, contractors and outsourced service providers, comply with this policy
- providing leadership in dealing with conflicts of interest and exercising sound judgement when considering how these are managed
- ensuring that relationships with suppliers and other contractors remain on a professional footing, free of conflicts of interest
- reporting reasonably suspected breaches of this policy
- documenting the receipt and outcome of disclosures or reports of conflicts of interest, secondary employment, gifts, benefits, bribes, personal interests, breaches, electoral expenditure, political donations, public interest, pecuniary interest or related party disclosures or any other disclosures/declarations reported to them or collected by them, including details of decisions made and actions taken. Documentation must be saved in a secure, limited access Content Manger folder
- reviewing conflicts of interest and secondary employment of staff (and any other ongoing declarations) at least annually or on commencement as manager noting the date and outcome of reviews. This must be documented and saved in a secure,

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limited access Content Manager folder and a copy provided to Business Assurance and Governance.

- notifying the Senior Governance Officer, tasked with maintaining the agency's Conflicts of Interest Central Register, of all of the above to be included in the Central Register after finalisation of current actions and documentation has been appropriately retained in accordance with record keeping procedures. Please workflow the document/folder as 'For File' to the Senior Governance Officer – Governance email to be actioned within 1 month. Business Assurance and Governance may review any matter to ensure the integrity of the City of Ryde accountability framework and compliance with its obligations.

7.6 Reporting Officers

Any officers with the responsibility of the collection of, or are reported to, for any conflicts of interest, secondary employment, gifts, benefits, bribes, personal interests, breaches, electoral expenditure, political donation, public interest, pecuniary interest or related party disclosures or any other disclosures or declarations are also responsible for:

- documenting the receipt and outcome of all the above reported to them or collected by them, including details of decisions made and actions taken as applicable, to be saved in a secure, limited access Content Manager folder
- notifying the Senior Governance Officer, tasked with maintaining the agency's Conflicts of Interest Central Register, of all of the above to be included in the Central Register after finalisation of current actions and documentation has been recorded. Please workflow the document/folder as 'For File' to the Senior Governance Officer to be actioned within 1 month.

7.7 Senior Governance Officer

This role is responsible for:

- maintaining a Central Register for Conflicts of Interest and including in this register all declarations including:
 - Personal Interests by senior executives, designated employees and others
 - Gifts, Benefits and Bribes including hospitality both accepted and not accepted
 - Secondary and multiple employment requests including voluntary / unpaid work and both approved and not approved requests
 - any reports of conflicts and bribes including PIDs
 - any other Conflicts of Interest disclosures or declarations
- adding review dates and outcomes as advised to the central register
- including publicly available disclosures to the NSW Electoral Commission in the central register per <https://efadisclosures.elections.nsw.gov.au/>
- conducting an annual review of the central register
- updating this policy every 3 years or as required by legislative changes whichever occurs first.

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8. BREACHES

Breaches of this policy may result in disciplinary action. Breaches that are reasonably suspected to amount to corrupt conduct will be reported to the **NSW Independent Commission Against Corruption (ICAC)**. Breaches that amount to criminal conduct will be reported to the police.

You must report any reasonably suspected breaches of this policy as it relates to:

- your own conflicts of interest. Reporting a breach, especially if it is due to a previous oversight on your part, may be taken into account when investigations are made into the matter
- the conflicts of interests of other staff, councillors, contractors, consultants and service providers, should you become aware of any. Any concerns you may have need to be treated as confidential to protect the rights of the other person.

Regarding the above, refer the matter to your line manager in the first instance. In the unlikely scenario that your concerns are about the conduct of your line manager, please speak to the Manager Business Assurance and Governance or a member of the Executive Leadership Team.

9. FURTHER INFORMATION

Further information about this policy and the management of conflicts of interest can be obtained by:

- contacting the Manager Business Assurance and Governance
- contacting the Senior Governance Officer
- visiting the websites of the **NSW Independent Commission Against Corruption** at www.icac.nsw.gov.au or the **Public Service Commission** at www.psc.nsw.gov.au or the **NSW Electoral Commission** at www.elections.nsw.gov.au

Related COR policies include:

- Code of Conduct – Standards of Conduct
- Code of Conduct – Complaints Procedure
- Fraud and Corruption Prevention Policy
- Gifts and Benefits Policy
- Secondary and Multiple Employment Policy
- Related Parties Disclosure Policy
- Social Media Policy

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Related Legislation includes:

- Public Interest Disclosure Act 2022
- Local Government Act 1993
- Local Government (General) Regulation 2021
- Government Information (Public Access) Act 2009 (GIPA Act)
- Privacy & Personal Information Protection Act 1998 (PPIP Act)
- Model Code of Conduct for Local Councils in NSW
- Electoral Act 2017
- IPC Information Access Guideline 1

Nothing in this policy limits any applicable legislation.

CHIEF EXECUTIVE OFFICER

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APPENDIX 1: ADDITIONAL INFORMATION – PERSONAL INTERESTS THAT CAN CONFLICT WITH PUBLIC DUTIES

This section provides some additional material about the types of personal interests that can conflict with public duties. It is descriptive rather than prescriptive and therefore does not sit in the main body of the policy.

Personal interests that may trigger a conflict of interest include:

- financial interests
- people who are more than acquaintances
- connections to people who have provided income or may provide income
- organisations and clubs, and people connected to them
- connections to people and entities who have given benefits or favours
- other close connections.

As a general rule, the personal interests of your family members and close connections are considered to be your personal interests.

Financial interests

Financial interests can be direct or indirect, short-term or long-term, and can stem from both gains and losses. The financial interests of your immediate family members or any other member of your family economic unit are normally deemed to be your interests. Examples of financial interests include:

- sources of income, including secondary employment
- ownership or lease of land, buildings and property
- shares or investments in companies, partnerships or other entities
- beneficial interest in a trust or deceased estate
- loans or debts
- an option to buy or sell an asset or any other anticipated future financial benefit.

People who are more than acquaintances

Any relationship with a person, who is more than an acquaintance, could be a personal interest. This typically includes spouses, relatives (including relatives by marriage), friends, romantic partners, close colleagues, mentors and social connections. It can also include people with whom you formerly had a close relationship; for example, a previous spouse, ex-colleague or an old friend. Feelings of enmity or hatred towards a person can also constitute a personal interest.

The Commonwealth Fair Work Ombudsman defines “Immediate Family Member” as:

“A spouse or former spouse, de facto partner or former de facto partner, child, parent, grandparent, grandchild or sibling of an employee, or a child, parent, grandparent,

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grandchild or sibling of an employee's spouse or de facto partner. It includes step-relations (eg. step-parents and step-children) as well as adoptive relations".¹

Connections to people who have provided or may provide income

Other sources of income are financial interests. However, the people and entities associated with that income are also likely to be personal interests. Examples can include:

- any current provider of secondary or other employment
- current or former business partners
- customers, significant suppliers or contractors of a private business or other employer
- providers of future employment or business opportunities
- relationships with former employers and colleagues, especially if there is ongoing social contact.

Organisations and clubs, and people connected to them

A personal interest may arise from a connection with organisations or clubs that may be professional, sporting, recreational, community, arts, social and so forth. Hobbies about which you are passionate could also be classed as a personal interest.

Connections to people and entities who have given benefits or favours

Officials may have a personal interest if they could feel indebted or obligated to anyone who has provided gifts, benefits, hospitality or favours. It is not necessarily the gift or benefit itself that causes the conflict of interest, but the potential relationship and sense of obligation or expectation that could arise.

¹

<https://www.fairwork.gov.au/taxonomy/term/423#:~:text=A%20spouse%20or%20former%20spouse,spouse%20or%20de%20facto%20partner.>

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APPENDIX 2: ADDITIONAL INFORMATION – OPTIONS FOR MANAGING CONFLICTS OF INTEREST

This section sets out options for managing a conflict of interest. It is descriptive rather than prescriptive and therefore does not sit in the main body of the policy.

This policy requires managers to develop and implement a plan for managing conflicts of interest. Managers should be guided by the options set out below.

Options for reducing or amending the involvement of the conflicted employee or contractor include:

- removal from the relevant assignment or task
- limiting involvement to certain aspects of the process, including segregating or reducing duties
- temporary placement in a less senior role
- closer supervision or adding members to the team
- exclusion from certain discussions or meetings
- confinement to an advisory role with no decision-making authority or financial delegations
- exclusion from critical recordkeeping roles
- preventing dealings with external parties (such as tenderers)
- changing reporting lines
- limiting access to certain systems, information and assets
- ensuring that a colleague of equal or greater seniority (to the conflicted person) is involved in the matter
- engaging an independent expert to work on aspects of the matter
- engaging a peer or subject-matter expert to review the work of the conflicted person.

Options for reducing or amending the influence of the conflicted employee or contractor include:

- transferring the matter to another unit or team that is unconnected with the conflicted official
- transferring the conflicted person to another project, branch or unit (temporarily or permanently)
- creating a physical separation between the conflicted person and decision-makers
- removing access to electronic and physical records
- informing relevant colleagues that there is a conflict of interest and instructing them on how to meet probity requirements.

There are subtle differences between managing the involvement and the influence of a conflicted person. Management should be aware that, even if a conflicted officer has been removed from a matter, she or he may still exert influence, which should be avoided if possible.

Conflict of Interest Policy		
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Options for managing the personal interest of the conflicted employee or contractor include:

- obtaining agreement to relinquish ownership or control of a financial interest, such as shares or land
- prohibiting secondary employment
- obtaining an undertaking from the conflicted person to refrain from communicating with a particular person during a process, such as a recruitment exercise or a tender.

Options for changing the overall system or process include:

- requiring more detailed documentation
- designing the decision-making process to reduce the level of subjectivity and discretion
- documenting and publishing reasons for the decisions taken
- providing reminders to relevant staff about reporting alleged misconduct
- creating audio or video recordings of key decisions or meetings
- conducting a post-completion audit or review
- ensuring relevant audit and access logs in key IT systems are turned on and reviewed
- enhancing measures to protect information from unauthorised access, use or disclosure
- establishing internal controls to identify deviations from the established process
- appointing probity checkers, probity advisors or probity auditors
- providing additional training and awareness raising sessions.

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