

Conflict of Interest Policy

What This Policy Covers

This policy establishes processes for identifying, declaring, and managing conflicts of interest to ensure decisions are made with integrity and transparency. It covers actual, potential, and perceived conflicts for all governing persons, staff, and third parties.

Key Sections of the Policy

Types of Conflicts: Actual (exists currently), Potential (may arise), Perceived (appears to exist).

Includes financial interests, personal relationships, secondary employment, gifts and benefits, or other circumstances affecting objectivity.

Declaration Requirements: All governing persons and staff must declare conflicts immediately upon identification using COI Disclosure Form. Declarations recorded in Conflict of Interest Register.

Management Strategies: Depending on risk level - disclosure and monitoring, recusal from decisions, supervised management, divestment, or prohibition from involvement.

Risk Assessment: Conflicts assessed as Low, Medium, or High risk based on impact and likelihood. Higher risk conflicts require more stringent management and senior approval.

Ongoing Monitoring: Conflict of Interest Register reviewed quarterly by Executive Leadership Team. Annual audits of conflict management processes.

Training: All staff and governing persons receive conflict of interest training at induction and annually. Awareness activities conducted quarterly.

Specific Situations: Guidelines for student-staff relationships, business interests, family employment, gifts and hospitality, external appointments, and research partnerships.

Important Points to Remember

- Declare all conflicts immediately upon identification
- Use COI Disclosure Form for declarations
- Conflicts recorded in Conflict of Interest Register
- Management strategy depends on risk level

- Recuse yourself from conflicted decisions
- Annual training and declaration required
- Quarterly register review by Executive Leadership Team
- Gifts and benefits must be declared
- Student-staff relationships require careful management
- Zero tolerance for undeclared significant conflicts

Need Help?

For questions about this policy:

Head of Compliance, compliance@menzies.vic.edu.au, 1300 244 002

Related Policies and Documents

- MITP88 - Staff Code of Conduct
- MITP92 - Leadership and Accountability
- MITP74 - Risk Management and Financial Viability
- MITP16 - Staff Management
- COI Disclosure Form (MFA96)
- Conflict of Interest Register
- Standards for RTOs 2025 (Standards 4.1, 4.2)