Conflict of Interest Policy

Section 1 - Summary

(1) This Policy states Victoria University's (VU's) position on conflict of interest, including the requirement of all staff to avoid conflicts of interest wherever possible, and to identify, declare and manage conflicts that cannot be avoided.

(2) If a conflict exists, staff must work with their manager/supervisor or People & Culture to develop and implement an appropriate conflict of interest management plan, which must be approved by their manager.

(3) This Policy should be read in conjunction with the Appropriate Workplace Behaviour Policy and Delegations and Authorisations Policy.

Section 2 - Scope

(4) This Policy applies to:

a. All staff, contractors, consultants, volunteers, honorary, adjunct and emeritus appointees. This includes controlled entities.
b. All activities under the control or direction of Victoria University, whether conducted on or off University property or in a digital environment.

Section 3 - Policy Statement

Conflicts of Interest

(5) The University promotes an environment that is based on ethical behaviour, and founded on standards of honesty, responsibility, fairness and accountability, to maintain the integrity of its decision-making processes. At all times, staff and individuals are expected to perform their duties in the interests of achieving VU's Strategic Plan and avoid conflicts of interest.

(6) VU accepts that pursuit of its strategic and operational objectives may expose staff to risks of actual, potential or perceived conflicts of interest. Conflicts of interest must be identified, declared and appropriately managed in accordance with the processes detailed within the Conflict of Interest Procedure, to ensure VU maintains the highest levels of integrity and public trust. VU is committed to and expects adherence to the following principles in applying this Policy:

a. Staff members have a duty to place the interests of Victoria University above their private interests when carrying out their official functions.
b. VU recognises the importance of managing all potential, perceived, or actual conflicts ethically and transparently by creating a positive reporting culture.
c. Staff members are accountable for avoiding wherever possible or identifying, declaring and managing any actual, potential or perceived conflict of interest that applies to them.
d. Staff members with direct reports are accountable for identifying and overseeing management of their direct

reports' conflicts of interest, modelling good practice and promoting awareness of relevant policies.

e. This policy supports the physical and psychological safety and wellbeing of Students and Staff, and the prevention of gender-based violence.

(7) A conflict of interest can be:

a. Actual – there is a real conflict between a staff member's University duties and private interests.
b. Potential – a staff member has private interests that could conflict with their university duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk.
c. Perceived – the public or a third party could form the view that a staff member's private interests could improperly influence their decisions or actions, now or in the future.

(8) The following are common areas where a conflict of interest may arise or exist:

a. Personal and intimate relationship involving students
b. Personal and intimate relationship involving staff
c. Commercial activity
d. Directorships and shareholdings
e. Financial interests
f. Gifts, benefits and hospitality
g. Research and teaching
h. Other employment (paid or unpaid) or consultancy
i. Recruitment and promotion

(9) The University expects the highest standards and conduct and integrity in relation to Conflicts of Interest. Each person covered by this Policy must:

a. avoid Conflicts of Interest;
b. declare in advance and actively manage Conflicts of Interest appropriately, and in accordance with this Policy. When a conflict of interest is declared, a Conflict of Interest Management Plan will be prepared by the staff member/s in consultation with their manager/supervisor and/or the Department Head where there are multiple people involved, to eliminate, manage or resolve the conflict.
c. follow any direction(s) given in line with this Policy to avoid or manage a Conflict of Interest to VU's reasonable satisfaction (including providing information and documentation as requested).

(10) Where a University body or committee has a specific policy instrument in place to address conflicts of interest, that requirement must be met; in addition to the requirements under this Policy and the Conflict of Interest Procedure. Examples of specific policy instruments include the following:

a. Recruitment and Selection Policy and Recruitment and Selection Procedure;
b. Purchasing Procedure;
c. Higher Education Academic Promotions Procedure;
d. Conflict of Interest - Staff-Authored Texts Procedure; or
e. Another policy instrument applying to a situation, body or committee that requires a conflict of interest disclosure.

(11) If staff are unsure about whether a conflict of interest exists, how to prepare a conflict of interest declaration or create a management plan, or otherwise how to manage a conflict of interest, they should seek advice from their

supervisor, People and Culture or Risk and Compliance Departments. If still in doubt, the person must make a declaration of the conflict of interest.

(12) A person who is advising on, considering or approving another person's management plan for a conflict of interest must themselves be free from conflict of interest in the matter. If they have a conflict of interest in relation to the matter, they must withdraw from exercising those responsibilities.

(13) A Conflict of Interest Management Plan should be developed and reviewed every 12 months or sooner if anything changes.

Managing Personal and Intimate Relationships

(14) VU recognises that personal and intimate relationships may develop in the workplace. This policy recognises that intimate personal relationships, particularly where power imbalances exist, may present actual or perceived conflicts of interest that can compromise safety, fairness, and trust. These provisions support the university's obligations under the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025.

(15) VU requires that staff and individuals this policy applies to declare any current or past intimate personal relationships with:

a. Another staff, where one has (or is likely to have) supervisory, decision-making, or oversight responsibilities in relation to the staff; and
b. A student, where the staff member has (or is likely to have) any academic or other decision-making responsibilities in relation to that student.

(16) Where such a declaration is made, in accordance with clause 11, implement a Conflict of Interest Management Plan. This will include permanent alternative teaching, research, or working arrangements as necessary to ensure transparency, fairness, and the integrity of academic and professional environments.

Gifts, benefits and hospitality

(17) VU Staff are expected to behave honestly and with integrity at all times in accordance with this Policy and the Conflict of Interest - Gifts, Benefits and Hospitality Procedure.

(18) All staff must:

a. not accept gifts, benefits or hospitality that could raise a perception of, or actual, bias or preferential treatment.
b. not accept other offers from those about whom they are likely to make business decisions.

(19) Staff members are accountable for:

a. Declaring all reportable offers of gifts, benefits and hospitality;
b. Responsibly providing gifts, benefits and hospitality;
c. Monitoring the total of cumulative offers over a 12 month period.

Concurrent ethical, legal and employment obligations

(20) Disclosures made to VU under this Policy do not absolve staff of any third-party obligations with respect to conflicts of interest. For example, researchers may have concurrent obligations to disclose conflicts of interests to committees and to third parties (e.g., funding bodies such as the Australian Research Council). Likewise, compliance with external obligations does not replace obligations to the University under this Policy.

This policy document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. It is the responsibility of the individual reading this document to always refer to Victoria University's Policy Library for the latest version.

Breaches

(21) A failure to avoid, declare and/or appropriately manage a Conflict of Interest, or otherwise comply with this Policy, may result in disciplinary action. In serious cases, referral to public agency bodies, such as the Independent Broad-based Anti-corruption Commission (IBAC) may also be made.

(22) Other potential consequences of a failure to disclose or manage a conflict of interest in accordance with this policy include:

a. the unwinding of commercial agreements;
b. contractors being subject to contract renegotiation or termination of contract;
c. a person being required to step down from boards, University committees or other governance roles;
d. a graduate research supervisor's registration being revoked;
e. decisions, actions or appointments being invalidated, and,
f. conduct constituting corrupt conduct under the Independent Broad-based Anti-corruption Commission Act 2011 (Vic).

Obligations of Key Management Personnel

(23) Key management personnel are required to disclose interests which will enable the University to identify related party transactions for the purposes of preparation of Victoria University annual financial statements, in compliance with accounting standards. For this purpose, related parties include close family members and any entities controlled or jointly controlled by either the key management personnel or close family members. This clause aligns to TEQSA Fit and Proper Person requirements.

Privacy

(24) The Privacy Policy applies to any personal information collected. All Conflict of Interest Declarations are treated as highly sensitive and confidential information. Access to this information is restricted to selected persons within the People and Culture and Central Compliance teams.

Record Keeping

(25) Conflict of Interest Management Plans will be kept for at least 7 years.

Section 4 - Procedures

(26) Conflict of Interest Procedure

(27) Conflict of Interest - Staff-Authored Texts Procedure

Section 5 - TEQSA/ASQA/ESOS Alignment

(28) HESF: 6.1 Corporate Governance; 6.2 Corporate Monitoring and Accountability.

(29) Outcome Standards for Registered Training Organisations Instrument 2025: Standard 4.1 & 4.2 Leadership and Accountability; 4.3 Risk Management; 4.4 Continuous Improvement.

Section 6 - Definitions

(30) Benefits: Includes preferential treatment, privileged access, favours or other advantage offered to an individual. This may be provided in connection with a current duty or role, or in anticipation of a future action, decision, or relationship.

(31) Conflict of interest: A conflict of interest exists if an individual has a private interest that could influence, or reasonably be seen to influence, how they perform their university duties.

(32) Conflict of interest management plan: A plan that records the steps that will be taken to manage an identified conflict of interest under this Procedure.

(33) Conflict of interest register: A central register which records staff conflict of interest disclosure and management plans.

(34) Controlled Entity: Is an organisation or company that is under the control of another entity, typically a parent company or government body (e.g. Research Institutes).

(35) Gifts: Are free or discounted items or services and any item that would generally be seen by the public as a gift. These include items of high value (e.g. artwork, jewellery or expensive pens), low value (e.g. small bunch of flowers), and consumables (e.g., chocolates) and services (e.g. painting and repairs).

(36) Hospitality: Is the reception and entertainment of guests. Hospitality may range from light refreshments at a meeting to restaurant meals and sponsored travel and accommodation.

(37) Intimate personal relationship: An intimate personal relationship refers to a connection that extends beyond a professional or platonic relationship, regardless of gender. This includes current or previous romantic involvement, dating, financial dependency, or consensual sexual activity, including one-off encounters. Such relationships may present a conflict of interest or appear to likely influence decision-making, supervision, or collaboration.

(38) Personal relationships : Relationships within the scope of this policy and procedure and individuals or people that extend outside of the University or University duties, or a relationship where a reasonable person may perceive that there could be some bias, either positive or negative, resulting from that relationship.

(39) Private interest: Private interests may be direct interests, such as an individual’s own personal, family, professional or business interests, or indirect, such as another person or group that they are or were closely associated with, or have an ongoing interest in. They may be financial or non-financial.

This policy document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. It is the responsibility of the individual reading this document to always refer to Victoria University's Policy Library for the latest version.

Status and Details

Status	Current
Effective Date	31st October 2025
Review Date	31st October 2028
Approval Authority	Vice-Chancellor
Approval Date	31st October 2025
Expiry Date	Not Applicable
Accountable Officer	Lisa Line Deputy Vice-Chancellor Enterprise and Digital Lisa.Line@vu.edu.au
Responsible Officer	Simone Wright Chief People Officer +61 3 9919 5447
Enquiries Contact	Eva Alexiou People & Culture Service Improvement Lead 9919 4613

This policy document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. It is the responsibility of the individual reading this document to always refer to Victoria University's Policy Library for the latest version.