

# Conflict of Interest Procedure

## Section 1 - Summary

(1) This Procedure sets out the steps to be taken to identify, declare, manage and monitor a conflict of interest.

## Section 2 - Scope

(2) This Procedure applies to:

- a. All staff, committee members, contractors, volunteers, honorary, adjunct staff and emeritus appointees.
- b. All activities under the control or direction of Victoria University (VU), whether conducted on or off University property or in a digital environment.

(3) This Procedure does not apply to Council members, who should refer to the [University Council - Conduct of Council Business and Standing Orders Procedure](#).

## Section 3 - Policy/Regulation

(4) [Conflict of Interest Policy](#)

## Section 4 - Procedures

### Part A - Summary of Roles/Responsibilities

Roles	Responsibilities
Audit and Risk Committee	Set and promote a positive organisational culture in relation to conflict of interest risk identification. Receive regular reporting on conflict of interest processes and their effectiveness.
Vice-Chancellor and Vice-Chancellor Group (VCG) members	Set and promote a positive organisational culture in relation to managing conflict of interest risk. Oversee compliance of direct reports with the Conflict of Interest Policy and Procedure.
Office of the General Counsel / General Counsel	Provide legal advice, where necessary, to ensure the proper assessment, management and handling of any conflict of interest matters. Recommend mitigation strategies and Conflict of Interest Management Plans.

Roles	Responsibilities
Managers/Supervisors	<p>Promote a positive organisational culture in relation to conflict of interest risk identification.</p> <p>Be aware of the conflict of interest risks inherent in direct reports' roles. Oversee the development and implementation of their conflict of interest management plans as required.</p> <p>Review and, where appropriate, approve conflict of interest declarations submitted by direct reports within an appropriate timeframe (what constitutes an appropriate timeframe for approving a conflict of interest declaration will depend on the circumstances).</p> <p>Model good practice.</p>
All roles in scope of this Procedure, including staff	<p>Be aware of and proactively identify conflicts of interest.</p> <p>Declare conflicts of interest in writing to the appropriate manager/supervisor using the <a href="#">Conflict of Interest Declaration form</a>.</p> <p>Comply with the approved conflict of interest management plan, which will be developed in consultation with their manager/supervisor.</p> <p>Regularly assess and monitor their plan, notifying their manager/supervisor of any changes that may affect the plan or its risk level.</p> <p>If in doubt, seek advice from their manager/supervisor or People and Culture.</p> <p>Consider conflict of interest and exposure to risk when exercising delegations as per Clause 10 of the <a href="#">Delegations and Authorisations Policy</a>.</p>
People and Culture	<p>Monitor and administer responses to the Conflict of Interest Declaration Form, identifying and escalating any issues to the relevant VCG member.</p> <p>Maintain the University's Conflict of Interest Register.</p> <p>Ensure appropriate records management processes are followed in regard to the collection and storage of conflict of interest declarations.</p>
Risk and Compliance	<p>Oversee and monitor conflict of interest compliance, identifying emerging risks and escalating them to senior management.</p> <p>Promote conflict of interest awareness among staff, encouraging timely and accurate declarations.</p> <p>Provide assurance on conflict of interest practices to the Audit and Risk Committee and University Council.</p>
Academic Quality and Standards	<p>Periodically monitor compliance with the <a href="#">Staff-Authored Texts Procedure</a>.</p> <p>May access the COI Register for compliance with the <a href="#">Staff Authored Texts Procedure</a>.</p>
Executive Director Procurement and Finance Operations	<p>Oversee conflict of interest monitoring and management within Procurement processes.</p> <p>May access the COI Register for compliance with the <a href="#">Purchasing Policy</a>.</p>
Research Services	<p>Conduct due diligence in relation to potential conflict of interest risks (including foreign interference risks) as part of Research funding processes.</p>

## Part B - Procedures

### Identify conflicts of interest

(5) Conflicts of interest are common, and many people will have them in the course of their employment. Having a conflict of interest is not, in itself a sign of wrongdoing, however all staff must take reasonable steps to avoid any actual, potential or perceived conflict of interest and act in the best interests of the University.

(6) All staff have a responsibility to:

- a. Declare any conflict of interest, whether actual, potential or perceived, including prior to or during their employment at or service to the University.
- b. Where appropriate, and/or when directed to by the University, immediately remove themselves from a situation giving rise to a conflict until the conflict has been addressed under these procedures.
- c. Report any concerns in relation to a conflict of interest that you have knowledge of that relates to another staff

member.

(7) Examples of a conflict of interest include, but are not limited to:

- a. Any outside employment or work, whether paid or unpaid, including directorships, shareholdings, and board memberships.
- b. Commercial relationships or contracts, including contracts with the University or any of its subsidiaries (other than a contract relating to their employment).
- c. Personal, familial, romantic or sexual relationships, including an intimate personal relationship with a staff or student where there is an academic, supervisory, decision-making or oversight responsibilities.
- d. Professional or personal association with individuals or contractors, including existing or potential University contractors or suppliers.
- e. Affiliations or relationships with a foreign government or foreign institution, including any financial benefit or commitment in respect of any such affiliation or relationship.
- f. Any use of University funds, resources or assets which may benefit the University staff member in a personal capacity.
- g. Any use of University funds, resources or assets for political contributions or donations which may benefit the University staff member in a personal or professional capacity (outside of their employment at the University).
- h. Using the University's intellectual property and resources to benefit a third party without prior written authority of the University.
- i. Managing or assessing the performance of or supervising a person with whom a staff member has, or has had, a close personal, or familial relationship.
- j. Teaching, undertaking assessment of, or supervising a student with whom a staff member has, or has had, a close personal or familial relationship.
- k. Receiving research funding from an external organisation with which the lead researcher or a team member has a close personal or familial relationship.
- l. Having a close personal or familial relationship with another member of the research team that may influence, or appear to influence, decisions related to project proposals, allocation of resources, employment or appointment processes, authorship, or other aspects of research conduct and collaboration.
- m. A staff member directly or indirectly engages a company they co-own to provide services to the University, using University funds, without declaring their interest.
- n. A researcher begins commercialising a product developed through a University-funded project without disclosing the activity or obtaining formal authorisation to use the research IP.

(8) Personal relationships between staff and staff/students carry inherent risk due to a potential or perceived imbalance of power and influence. All staff must be aware of and manage the impacts that these relationships may have in the workplace or study environment, especially where they give rise to actual, potential or perceived conflicts of interest.

(9) Staff may seek advice or report concerns to their manager/supervisor or People and Culture Business Partner. The Dean, Graduate Research and Executive Director, Research Services may be consulted for research-related conflict of interest matters.

## **Declare conflicts of interest**

(10) In order to disclose or declare a conflict of interest, complete the online [Conflict of Interest Declaration form](#) and this will automatically be submitted to People and Culture for review.

(11) A conflict of interest must be disclosed or declared prior to the conflict of interest arising and in all other circumstances as soon as practicable after becoming aware of it.

(12) Prior to submitting a declaration form:

- a. staff must notify their manager/supervisor
- b. members of the Executive must notify the Vice-Chancellor (or nominee), and
- c. contractors, consultants, partners and other associates of the University must notify their manager/supervisor or the person within the University who has engaged their services.

(13) If a staff member has a conflict of interest, they may not automatically be excluded from undertaking their work duties, such as making certain decisions. The management plan that is developed will be proportionate to the level of risk posed by the conflict of interest.

(14) COI declarations for suppliers and staff involved in procurement are managed by the Executive Director Procurement and Finance Operations in accordance with the [Purchasing Procedure](#).

## **Conflict of Interest Management Plans**

(15) A Conflict of Interest Management Plan will be prepared by the staff member as part of the declaration form and in consultation with their manager/supervisor and if this is not appropriate, the Department Head to eliminate, manage or resolve the conflict.

(16) Once approved by the appropriate manager/supervisor, the Conflict of Interest Declaration Form with the Management Plan is submitted to People and Culture.

(17) Conflict of Interest Management Plans will ensure conflicts are managed and resolved in favour of the public interest rather than that of the staff member and may include the following mitigation strategies:

- a. Restrict: restrictions are placed on the staff member's involvement in the matter.
- b. Recruit: a disinterested third party is used to oversee part or all of the process that deals with the matter. In most circumstances, a subordinate would not be considered an independent third party.
- c. Remove: the staff member removes themselves, or is removed, from the matter.
- d. Relinquish or Resign: the staff member relinquishes the private interest that is creating the conflict. Where relinquishing the interest is not possible (e.g. relationship with family) and the conflict cannot be managed in the public interest using one of the other options above, the staff member may consider resigning as an alternative option.

(18) The staff member with the conflict of interest will be required to undertake actions agreed in the Management Plan to appropriately mitigate or remove the risk as appropriate. Staff and supervisors are responsible for ensuring the Conflict of Interest Management Plan is implemented.

(19) Where a conflict of interest is determined to be of high risk, for example where the conflict of interest cannot be readily minimised or removed through a Conflict of Interest Management Plan, the declarant's manager/supervisor must notify and consult with the Office of the Chief People Officer.

(20) Where a conflict of interest involves outside employment or roles (whether paid or unpaid), the staff member must also follow any relevant University policies or procedures, including in relation to approval to engage in any such activities and conditions imposed.

## **Monitor conflicts of interest**

(21) Staff and their manager/supervisor will review Conflict of Interest Management Plans at least every 12 months to ensure they remain effective and will include such discussions as part of the VU Develop where appropriate.

(22) Where the circumstances of a previously disclosed conflict of interest change, including where there is no longer a conflict of interest, the staff member must again advise the person previously notified under clause (12) and submit a revised [Conflict of Interest Declaration form](#).

## Part C - Oversight

### Maintenance of the Conflict of Interest Register

(23) Conflict of interest disclosures and management plans will be recorded within a central COI Register that is maintained by People and Culture.

(24) The Chief Risk Officer (or delegate) will periodically review the Conflict of Interest Register, and supporting declaration forms and management plans, for compliance with the Conflict of Interest Policy and this Procedure.

(25) VU collects and holds personal information in the COI Register solely for internal use and for the purposes of complying with this Policy. Information will be managed in accordance with the [Privacy Policy](#).

(26) Academic Quality and Standards may periodically monitor compliance with the [Staff-Authored Texts Procedure](#).

## Section 5 - TEQSA/ASQA/ESOS Alignment

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

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

## Section 6 - Definitions

(29) Conflict of duty: A conflict of duty arises when an individual is required to fulfil two or more roles that may be in conflict with each other.

(30) Conflict of interest: A conflict of interest is where an individual has private interests that could improperly influence, or be seen to influence, their decisions or actions in the performance of their university duties.

(31) 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.

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

(33) 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 if they influence decision-making, supervision, or collaboration.

(34) Personal Relationships: Relationships between personnel within the scope of this 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.

(35) 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.



## Status and Details

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