

## CONFLICT OF INTEREST POLICY

### PURPOSE

This policy aims to develop increased awareness and understanding of the situations in which conflicts of interest may impact on CG Spectrum Institute (CGSI), and in doing so provide protection for both the institution and the individuals concerned.

### SCOPE

This policy applies to all staff, students, and other representatives of CGSI.

### DEFINITIONS

**Conflict of Interest** refers to a conflict between an individual's official duties for CGSI and private interests and / or close personal relationships, where the private interests or personal relationships might improperly influence the way in which that person carries out his / her official duties.

**A Perceived Conflict of Interest** exists when a reasonable person may consider that private interests or personal relationships might improperly influence the way in which an CGSI staff member, Board or Committee member carries out his / her official duties.

**Private Interests** mean anything that can have an impact on an individual's primary duty to act in the best interests of CGSI. It refers to any interests that involve potential gain or loss (financial or non-financial) for an individual or any other person or organisation that individual may wish to benefit.

**Close Personal Relationship** means a relationship between an individual and a relative (parent, grandparent, child, sibling, cultural or extended family), a financially dependent person, a close friend, a spouse, de facto or same sex partner, or any person with whom there is currently, or has been, an intimate partner relationship.

**Personal Information** is defined as any information that would allow an individual to be identified, or any information relating to the person's study or work at CGSI as an employee, contractor or supplier. This includes name, phone number, email address, address, bank details, nationality, date of birth, educational history, enrolment history, physical characteristics, license, passport number, medical information, staff or student identification numbers or any other information that can identify an individual.

### RESPONSIBILITIES

The **CEO** is responsible for:

- the implementation of this policy, assessing whether the disclosure by a staff member or other person represents a conflict of interest
- when there is a conflict of interest, developing a strategy for managing the conflict
- when a management strategy is developed, for reviewing and monitoring the strategy to ensure its objective is achieved; and
- recording all of the above steps, obtaining the individual's agreement with the content, then including this documentation in the individual's personnel file.

**All individuals** are responsible for identifying, disclosing, and if possible avoiding, conflicts of interest.

## **POLICY**

1. CGSI values the integrity of its operations and decision-making processes and seeks to ensure no undue advantage or disadvantage occurs because of a conflict of interest.
2. When staff members become aware that, in the normal course of their duties, they have or could have unavoidable actual, perceived, or potential conflicts of interest, they are expected to immediately disclose the conflict, in writing, to the CEO or line manager, as most appropriate.
3. Disclosures will be regarded and protected as personal information and will be managed in collaboration with the staff member to ensure integrity, transparency and confidence in CGSI's operations, and to avoid harm for those involved.
4. The disclosure and agreed strategy for managing the conflict of interest will be documented. This confidential record will be included in the staff member's personnel file.
5. The best strategy for dealing with conflicts of interest is to avoid them as far as possible. Accordingly, staff members are expected to take all reasonable steps to ensure they do not create actual, perceived or potential conflicts of interest.
  - 5.1 An example of a conflict of interest is involvement in the admission, assessment or supervision of a student with whom a staff member has or has had a close personal relationship.
6. When CGSI staff have business, professional interests or engagement with other providers of higher education, whether paid or unpaid, it is important that staff ensure these do not conflict with their employment by CGSI
7. Academic staff will take reasonable steps to avoid inappropriate social activities and interactions with students outside of the formal educational setting.
  - 7.1 Inappropriate activities include attendance at a student's private function, or a social meeting between a staff member and student.
  - 7.2 Appropriate activities include attendance at conferences, professional meetings, professional development workshops, and other similar activities which students may also attend.
8. Staff will disclose receipt of gifts, benefits or hospitality, accrued through their work role, valued above \$100.
9. The offering or provision of private tuition by academic staff for CGSI students is a direct conflict of interest.
10. Students and staff will not be treated differently because of an outside interest, or political or religious views.

## **RELATED**

Privacy Policy  
Staff Induction Program Policy  
Staff Induction Procedure  
Code of Conduct  
Staff Grievance and Complaints Policy

**Version Control**

<b>Document:</b> Conflict of Interest Policy		
<b>Approved by:</b> Academic Board		<b>Date:</b> 24 February 2020
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V2.1	Minor edits and logo	