

Conflict of Interest Policy

Purpose

1. This Policy outlines the principles applying to actual, potential or perceived conflict of interest and in so doing how Global Higher Education (GHE) meets the requirements of Domain 6 (Governance and Accountability) of the *Higher Education Standards Framework (Threshold Standards) 2021*.

Scope

2. This Policy applies to all staff of GHE and all members of governance boards and committees.

Definitions

3. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

Suite documents

4. This Policy is linked to the Conflict of Interest Procedure.

Policy

Principles

5. Conflict of interest is a situation in which an individual has competing professional and personal interests. Conflicts of interest are particularly relevant where an individual has a decision-making role.
6. GHE acknowledges that conflicts of interest are not wrong in themselves and can happen without anyone being at fault. However, it is vital that they are disclosed and managed effectively so that staff may perform their duties in a fair and unbiased way.
7. Personal interests that can give rise to conflicts may be pecuniary, involving an actual or potential financial gain, or non-pecuniary without any financial element.
8. A risk assessment of conflicts of interest is likely to identify some or all of the following corruption risks:
 - a) a staff member not disclosing a private interest and favouring that interest when making decisions;
 - b) a staff member exercising their duties in such a way as to benefit a business interest, property interest or prevent that interest from being adversely affected;
 - c) a staff member exercising their duties in such a way as to benefit a relative, close associate or secondary employer or prevent adverse outcomes;
 - d) a staff member exercising their duties in such a way as to benefit a future employer or potential future employer or prevent them from being adversely affected;
 - e) a staff member exercising their public duties in such a way as to adversely affect a person or group that they dislike or are prejudiced against.

9. Common areas where a conflict of interest may arise include:
 - a) personal relationships involving students;
 - b) personal relationships involving staff;
 - c) commercial activity;
 - d) directorships and shareholdings;
 - e) financial activities;
 - f) gifts, benefits and hospitality;
 - g) teaching;
 - h) other employment;
 - i) recruitment and selection.
10. Conflicts may be:
 - a) Actual – where there is direct conflict between an individual’s duties and responsibilities to GHE and a competing interest or obligation;
 - b) Potential - where an individual has an interest or obligation that could conflict with their responsibilities to GHE;
 - c) Perceived – where it could reasonably be perceived that a competing interest could improperly influence an individual’s decisions or activities in relation to GHE.
11. All GHE staff and Board members are expected to act ethically and with integrity and in accordance with the Staff Code of Conduct (see **Human Resources Framework**).
12. In general individuals should take whatever steps are possible to avoid any conflicts of interest. Where an actual, potential or perceived conflict arises individuals should:
 - a) remove themselves from the conflict;
 - b) ensure appropriate controls are in place to manage the conflict;
 - c) where required, disclose the conflict or improper conduct.
13. GHE will take steps to identify and manage any conflicts of interest or breaches of this Policy as outlined in the **Conflict of Interest Procedure**.

Associated information

Related Internal Documents	Conflict of Interest Procedure Board Appointment, Renewal and Removal Policy Financial Framework Governance Framework Human Resources Framework Intellectual Property and Copyright Policy Glossary of Terms
Related Legislation, Standards and Codes	<i>Tertiary Education and Quality Standards Agency Act 2011</i> <i>Higher Education Standards Framework (Threshold Standards) 2021</i> TEQSA Guidance Note: <i>Corporate Governance</i> , Version 2.4
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	23-July-20	V1.1 Administrative updates
	9-Oct-23	V1.2 administrative updates following TEQSA registration

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