

# Disclosure Policy

## Purpose

This Policy sets out the obligations of UNSW employees to identify, disclose and manage actual, perceived or potential personal or other interests. It aims to ensure transparency, integrity and ethical decision making, building public trust in UNSW.

Conflicts of interest can arise from an employee's personal interests or outside work, which might impact their responsibilities at UNSW. This policy aligns with the [Code of Conduct and Values](#) and the [Australian Code for the Responsible Conduct of Research](#).

The Procedure sets out the:

- steps to be taken to identify, disclose and manage a conflict of interest and
- obligations of the supervisor of the employee when a disclosure of interest has been received.

## Scope

This Policy applies to all employees across all work duties, functions and situations including:

- use of UNSW Resources
- participation in UNSW activities (work related events, conferences or sabbaticals)
- research, grading or procurement duties
- recruitment duties; or
- any other situation where an employee is acting for, representing, or may be perceived to represent UNSW.

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# Principles and objectives

This Policy outlines the principles for managing conflicts of interest so that employees understand and fulfil their obligations to make full disclosure of all facts where there is, could be, or may be perceived to be a conflict between their interests and their obligations to UNSW. Failure to comply with this policy and procedure may result in disciplinary measures, termination of employment or contracts, or notification and referral to external agencies for investigation.

UNSW acknowledges that not all interests will impact on UNSW, however, from time to time those interests (or duties owed to another person, group or organisation) can give rise to a conflict with the obligations owed by employees of UNSW.

This Policy:

- defines a conflict of interest
- sets out issues that may give rise to a conflict of interest including outside work and
- sets out the University's requirements on disclosing and managing conflicts of interest.

The *Disclosure Procedure* sets out the steps for declaring certain private interests and identifying, disclosing and managing a conflict of interest.

The [Australian Code for the Responsible Conduct of Research](#) guide for [Disclosure of interests and management of conflicts of interest](#) sets out best practice in the context of research.

## 1. What is a conflict of interest?

- 1.1. A conflict of interest occurs when an employee's private interests do or might conflict with their duties to UNSW.
- 1.2. Conflicts of interest may be:
  - Actual: a direct conflict between current duties and private interests.
  - Perceived: a situation that could appear to influence decisions, even if it doesn't.
  - Potential: a situation that could develop into a conflict in the future.
- 1.3. The Disclosure Procedure below provides more information about the circumstances in which a conflict of interest can or may arise.

## 2. Types of interests

Employees must be aware of the different types of conflicts of interest that can arise and are responsible to promptly disclose and appropriately manage any conflict of interest in accordance with this policy and procedure as they arise.

Employees should carefully consider the following areas in which conflicts may arise:

### 2.1. Private interests

Employees can have a variety of private interests:

- Financial interests, including any right, claim, title or legal share in something having a monetary or equivalent value, including (but not limited to) shares, share options and the right to receive remunerations such as salary, consulting fees, allowances, commissions, discounts or other similar payments.
- Professional and business interests, such as directorships and other office holdings.
- Personal relationships, whereby an employee may be involved in decisions affecting the employment or academic administration or teaching of a person with whom they have a family or close personal relationship, or with whom they have a business relationship or where a personal financial interest exists.

Many private interests will never give rise to a conflict of interest with the employee's duties to UNSW. However, a conflict of interest may arise when an employee (or a member of their family, a

close friend or an associate) gains a personal advantage or avoids disadvantage due to the employee's role or having access to information that is not available to others.

It is important for employees to be aware of their private interests and understand that a conflict of interest between those private interests and the interests of UNSW may arise at any time and must be fully disclosed.

## 2.2. Professional interests

Generally UNSW expects that professional employees will not perform outside work which is related to their work at UNSW or has the capacity to impact work performance for UNSW. However, the University recognises that there may be some circumstances when a professional employee may perform outside work that could be considered related to their work at UNSW. Such outside work is only permitted if it has been disclosed in advance, and it:

- Does not compromise the employee's integrity and independence;
- Does not conflict with their UNSW work or adversely affect their UNSW work performance;
- Does not involve UNSW time or resources; and
- Does not conflict with UNSW's obligations under contracts it has with other entities.

Fixed-term and continuing academic employees are required to ensure that any outside work is in accordance with the UNSW [Paid Outside Work by Academic Staff](#) Policy.

Where employees (including casual employees) complete paid or unpaid outside employment or voluntary work, employees are not permitted to disclose UNSW confidential information (e.g. information about students) or use without authorisation UNSW intellectual property (e.g. course materials).

A conflict of interest may occur where an employee (or a family member, a close friend or an associate) receives a gift or benefit that is, or may be perceived as, influencing the performance of the employee's University duties. The [Gifts and Benefits Policy](#) outlines when an employee must disclose receipt of gifts and benefits.

## 2.3. Research

In addition to the requirements of this policy, researchers have additional disclosure requirements under UNSW's [Code of Conduct and Values](#), the [Australian Code for the Responsible Conduct of Research](#), [research ethics](#) processes, and under the terms of business and policies of publishers and journals as well as grant funding bodies.

Institutes and researchers must promptly disclose interests to research participants, researchers, funding bodies, journal editors, publishers, institutes, relevant third parties, collaborators and the public.

## 2.4. Commercialisation

Commercialisation or other external activities related to UNSW intellectual property must be approved by the relevant manager, supervisor or Head of School prior to engagement and commencement.

UNSW recognises that conflicts of interest may arise where an employee seeks to commercialise IP or research through a staff spin out or with external parties such as a start-up company. Conflicts of interest in this context may be particularly complex and both UNSW Legal & Compliance and Industry & Innovation must be consulted to ensure that all conflicts of interest are identified and can be properly managed. For more information see [Managing Conflicts of Interest in Staff Spinouts and 10x Accelerator Companies](#).

# 3. Disclosure of Interests - International Activity

- 3.1. International partnerships and collaborations form an integral part of UNSW. However, there are legal and regulatory frameworks that can impact work with partners based abroad. There may also be potential conflicts of interests related to international collaborations.
- 3.2. It is important that UNSW is aware of the types of relationships that exist across the university with foreign institutions because the international environment and the Australian Government's foreign policy positions and legislation can shift rapidly. For example, international conflicts, UN and Australian Autonomous sanctions, Defence Export Controls or research that involves critical or sensitive technologies can all impact international collaborations. The Disclosure of Interests form

in myUNSW asks questions about foreign collaboration, engagements and affiliations so that support can be provided to staff to address and manage any issues as they arise.

#### 4. Disclosure requirements

- 4.1. UNSW expects that all employees will consider their circumstances and make the required assessment about whether their interests or duties give rise to a conflict of interest with their obligations to UNSW. Where a conflict of interest is identified, employees must immediately, without delay, disclose the conflict of interest truthfully and with enough information to enable UNSW to identify and understand the interests and if applicable, international activity. Employees must comply with any management plan put in place to manage or resolve the conflict. Do not wait for the annual disclosures process. A disclosed conflict and accompanying management plan must be updated if and when the situation changes.

- 4.2. All fixed-term and continuing employees must complete a Disclosure of Interests Form annually when requested, even if they do not have any interests to declare.

New fixed-term and continuing employees must complete a Disclosure of Interests Form within 14 days of commencing employment at UNSW.

Casual employees must disclose a conflict by completing a Disclosure of Interests Form as soon as the conflict arises and preferably before it occurs, or when directed to do so by UNSW.

- 4.3. People receiving a disclosure have additional responsibilities to take action as articulated in section 5 of the Disclosure Procedure.
- 4.4. The process for disclosing conflicts of interest is set out in the Disclosure Procedure. If in doubt, employees should assume there is a conflict of interest and make a disclosure.
- 4.5. Researchers are also required to disclose conflicts of interest to funding and other bodies as required.

#### 5. Confidentiality of disclosure

- 5.1. Personal information disclosed as part of compliance with this Policy and the Disclosure Procedure will be managed in accordance with the UNSW [Privacy Policy](#). Disclosure of a conflict of interest may create a risk of disclosing confidential information belonging to a third person. Employees who are concerned about the disclosure of third-party confidential information should seek advice from the UNSW Legal & Compliance.

#### 6. Reporting suspected conflict of interest

- 6.1. Concerns over conflicts of interest may be reported through the [Complaints Management and Investigation Policy and Procedure](#) or the [Public Interest Disclosure \(Whistleblowing\) Policy and Procedure](#).

# Disclosure Procedure

## 1. Identifying a conflict of interest and the conflict of interest test

- 1.1. The first step in disclosing a conflict of interest is identification.
- 1.2. Conflicts of interest may not be obvious. Sometimes the circumstances can give rise to more than one type of conflict of interest, whether actual, perceived or potential. A conflict of interest does not have to involve an opportunity to gain an advantage. Sometimes a conflict of interest involves avoiding a disadvantage. Sometimes, the advantage or disadvantage is financial, but this is not always the case.
- 1.3. It is not always easy to decide when private interests or duties are, or might be, in conflict with obligations owed to UNSW.  
  
The key test is:
  - whether a reasonable person ***could*** perceive that your personal interests ***could*** be favoured over your UNSW duties.
- 1.4. The test is objective – what is essential is that consideration is given as to how a situation may appear to a reasonable observer. The question to ask is:
  - what would a reasonable observer, unconnected to the situation, think?
- 1.5. Guidance and assistance in identifying a conflict of interest can be sought from:
  - the staff member's supervisor, Head of School, Faculty Executive Director or Director of Operations
  - People and Culture Business Partners
  - UNSW Legal & Compliance
  - the Director, Business Development and Commercialisation for matters related to spin out and start-up companies, and commercialisation of IP; and
  - Faculty Research Integrity Advisors for research with external parties where the staff member has an interest.
- 1.6. An employee or supervisor who is uncertain about whether a situation involves an actual, perceived or potential conflict of interest should seek advice to determine if a disclosure is required. Where an employee remains unsure about whether a conflict of interest exists or there is a difference of opinion between an employee, supervisor and advisors about whether there is a conflict of interest, a disclosure should always be made.

## 2. Disclosing an interest

- 2.1. It is the responsibility of the employee to disclose an interest as soon as it is identified.

**For continuing and fixed-term employees the *Disclosure of Interests Form* (the *Form*) in myUNSW must be used to disclose a conflict of interest. Casual employees can locate the *Form* located on the [HR Hub](#).** In completing the *Form*, full details of the conflict of interest must be provided so that UNSW can properly assess and manage or resolve the conflict noting that this may have implications for individuals. Resolving a conflict could encompass outcomes captured in Table 1 in 3.6 below.

- 2.2. The details to be disclosed include:
  - The nature of the interest involved in the conflict of interest. For example, does the conflict of interest involve a personal or family relationship, professional or a financial interest? Financial interests include any right, claim, title or legal share in something having a monetary value or

equivalent, including (but not limited to), shares, share options and the right to receive remunerations such as salary, consulting fees, allowances, discounts or other similar payments.

- Details of the ownership or control of any relevant external entity. This includes:
  - full details regarding the nature of the external entity such as whether it is a company, trust or partnership
  - directorships, shareholdings and any other interests (including equitable interests) held in the external entity
  - if the entity is engaged in any business, details of that business and details of how that business relates to the business or activities of UNSW.
- Whether the conflict of interest involves University resources, course materials developed at UNSW or research conducted by UNSW
- Whether the conflict of interest may involve procurement of goods or services by the University (including the amounts expected to be paid by the University)
- Benefits/detriments to any person, including the staff member themselves, and any third person (whether family member, close friend, business associate or other person with whom the employee has a personal relationship), and any entity in which the employee has an interest in relation to which the staff member holds a position or office to which the employee provides services.

See Appendix 2 Examples of Conflicts of Interest: for more information on the types of conflicts to be disclosed.

- 2.3. A completed *Form* must be provided to the relevant Head of School (for academic employees), Faculty Executive Director or Director of Operations (for professional employees) or other relevant leader, to approve. Deans are responsible for approving their Heads of Schools' disclosures and the relevant Vice President or Deputy Vice Chancellor approves the disclosures of Faculty Executive Directors and Director of Operations. It is then the responsibility of the approver to ensure the employee has proposed a plan to manage or resolve the conflict – see 3 - *Managing a Conflict of Interest* below.
- 2.4. In some situations, the person approving the disclosure may also be subject to a conflict. In such cases, the matter must be escalated to the supervisor of that person.
- 2.5. The Form will be recorded and stored in People & Culture records maintained by the Chief People Officer. The disclosure may be reviewed by the People and Culture Business Partners, Legal & Compliance and National Security to ensure that management plans are in place where required.
- 2.6. Researchers must also disclose conflicts of interests to ethics committees, and to other third parties which expect such disclosure, e.g. grant funding bodies such as the Australian Research Council. These disclosures are required *in addition* to the completion of the *Form*. Disclosures made to UNSW under this policy do not absolve researchers of other obligations with respect to conflicts of interest.

### **3. Managing a conflict of interest**

- 3.1. Once a conflict of interest is identified and disclosed, the next step is to manage the conflict.
- 3.2. It is sometimes thought that a conflict of interest is sufficiently dealt with if it is disclosed. This is not the case. Disclosure is only one step and it is necessary for the supervisor or research integrity advisor to decide if further steps need to be taken to manage the conflict of interest properly.
- 3.3. Where a conflict of interest has been identified and subsequently disclosed, it is the responsibility of the employee to:
  - assess the conflict of interest, and
  - develop a proper management plan.
- 3.4. Further details about the obligations of the approver are detailed below in 5 – *Approver*

### *Responsibilities.*

- 3.5. While an employee must propose a plan to manage a conflict of interest, their approver will need to assess the proposed management plan and determine whether the conflict can be managed and the plan approved. Approvers may propose amendments to the plan and will discuss these with the employee. Once agreed, the employee will be required to comply with the management plan and supervisors will participate in the monitoring and review of that management plan to ensure that the conflict is properly managed.
- 3.6. In making their assessment of an appropriate course of action, including the development of a management plan, employees and approvers should have regard to the '6 Rs' of conflict of interest management<sup>1</sup> in the table below:

Table 1: Used with permission from the WA Public Sector Commission: <https://icg.wa.gov.au/conflicts-interest>, accessed Nov 2017 (see also [https://www.icac.nsw.gov.au/ArticleDocuments/232/Managing-conflicts-of-interest-in-the-nsw-public-sector\\_June-2019.pdf.aspx](https://www.icac.nsw.gov.au/ArticleDocuments/232/Managing-conflicts-of-interest-in-the-nsw-public-sector_June-2019.pdf.aspx))

<b>Register (disclose)</b>	Recording the disclosure of a conflict of interest in a register is an important first step. It will then be necessary to assess the situation and determine an appropriate management plan.  <b>There may also be a requirement to disclose it to a funding body, research or industry partner, journal/publisher or ethics committee, in accordance with the terms of funding agreements, research contracts or other contractual or policy requirements.</b>
<b>Restrict</b>	It may be appropriate that the employee's involvement in the matter be restricted. For example, the employee may need to refrain from taking part in debate or decision making about a specific issue. It may also be necessary to restrict access to information relating to an issue which is the subject of the conflict of interest.
<b>Recruit</b>	An independent third party may need to be engaged to participate in, re-do, oversee or review and report on the integrity of a decision-making process or transaction.
<b>Remove</b>	Removing the employee from involvement in the matter altogether may be the best or only option in some circumstances.
<b>Relinquish</b>	An employee may be required to relinquish their personal or private interests, or another role or appointment they have, to ensure there is no conflict of interest. This could include, for example, requiring that shares are disposed of in a company, or requiring that the employee resign from a Board or from membership of a club or association.
<b>Resign</b>	Resignation from UNSW (or terminating a relationship with UNSW) may need to be considered if the conflict of interest cannot be managed or cannot be managed according to the agreed management plan.

- 3.7. An employee, or approver who is uncertain about whether a proposed management plan meets the requirements of this Procedure should consult with their People and Culture Business Partner (who may also seek advice from UNSW Legal & Compliance).

## **4. Monitoring and review**

- 4.1. Obligations in relation to disclosing a conflict of interest do not end with the establishment of a management plan. They are on-going and employees are required to review their circumstances regularly.
- 4.2. Accordingly, employees are required to report annually on any conflict of interest disclosure. In each report, an employee must advise:
- whether the conflict of interest still exists



- what actual steps, consistent with the management plan, have been taken to manage the conflict
  - whether the circumstances have otherwise changed such that the management plan should be amended to manage any new issues relating to the conflict of interest.
- 4.3. The type of changes which will normally be required to be disclosed are when there is a change in any of the matters disclosed or required to be disclosed.
- 4.4. Employees will be expected to disclose annually and on an ongoing basis as potential conflicts become apparent.
- 4.5. Consideration will be given by the supervisor and if required the Chief People Officer (or their delegate) as to whether the conflict of interest can still be managed and, if so, whether the management plan needs to be amended.
- 4.6. In addition, if there is any change in circumstances which affects the disclosure before annual reporting is due, an employee must notify their supervisor as soon as they become aware of the change. This is particularly important in circumstances where, either:
- The management plan is unable to be complied with, or
  - The management plan does not appropriately address the conflict
- 4.7. Any amendments that arise in these circumstances are to be recorded in the *Form* and will be recorded and stored in People & Culture records.

## 5. Approver responsibilities

- 5.1. Approvers, including the Head of School (for academic employees) or the Faculty Executive Director or Director of Operations (for professional employees), Deans, DVCs and VPs, and other relevant approvers, have an obligation to ensure that a conflict of interest, once disclosed, is managed appropriately, including by ensuring that the disclosure is submitted through the proper channels for inclusion on the Disclosure of Interest Register.
- 5.2. Upon receiving a conflict of interest disclosure from an employee, approvers are required to:
- ensure the employee who has made a disclosure develops a plan to manage the conflict of interest, having regard to the '6 Rs' of conflict of interest management outlined in 3 – *Managing conflicts of interest*, the principles and responsibilities set out in the [Code of Conduct and Values](#) and the *Disclosure Policy* above.
  - seek appropriate advice as needed from the relevant People and Culture Business Partner, Legal & Compliance, National Security Team, Director, Business Development and Commercialisation or the Pro Vice-Chancellor Industry and Innovation.
  - refer consideration of whether disclosure is required or consideration of a proposed management plan is required, to People and Culture
  - ensure that all employees who have disclosed a conflict of interest comply with the requirements of the management plan, including the monitoring and review of the conflict of interest disclosure.
- 5.3. It is essential that a management plan for a disclosed conflict of interest is implemented and maintained. It is the joint responsibility of the relevant employees and the supervisor to ensure that the plan is correctly implemented. See [Disclosures of Interests resources](#) for more information.

## 6. Role of Chief People Officer

- 6.1. If any matter concerning the Policy and Procedure cannot be resolved at the level of an employee and the approver, the matter should be referred to the People and Culture Business Partner, who will coordinate the matter being considered by the Chief People Officer.
- 6.2. The ultimate approving authority for determining the following matters rests with the Chief People



Officer:

- Whether there is an actual, perceived or potential conflict of interest between the employee or private interest and the interests of UNSW
  - Whether a conflict of interest can be managed or whether it requires the employee to either relinquish the private interest or resign
  - Whether a proposed management plan deals with the conflict of interest in accordance with this Policy and Procedure
  - Whether, following disclosure by an employee of changes related to the private interest, the conflict of interest can still be managed or now requires the employee to either relinquish the private interest or resign, or cease engagement with UNSW
  - Whether, following disclosure by an employee of changes related to the private interest, a Conflict of Interest Management Plan needs to be updated.
- 6.3. The Chief People Officer may refer any Conflict of Interest Management Plan for further advice to, for example, a Deputy Vice-Chancellor, Director, Risk or Chief Legal Officer, or may refer back to the employee's supervisor for further action.
- 6.4. The Chief People Officer may convene and chair a Conflict of Interest Management Plan Review Committee to provide advice and make a recommendation to the Chief People Officer about how conflicts should be managed in a particular case. The committee will comprise, as relevant: the Chief People Officer; Pro Vice-Chancellor Industry and Innovation; the Head of IP and Commercialisation Law; the Chief Legal Officer (or delegate); and a representative from the National Security team.

## **7. Recording disclosures of interest**

- 7.1. Copies of all conflict of interest disclosures and management plans are submitted to People and Culture and recorded centrally. The Chief People Officer (or delegate) will review disclosure forms and management plans for compliance with this Policy and Procedure.

## **8. Failure to comply with this Policy and Procedure**

- 8.1. Failure to comply with this Policy and Procedure by an employee or approver, including not disclosing an interest or refusing to take any reasonable action as directed to resolve or manage a conflict of interest, may lead to adverse consequences for both individual employees and UNSW itself, as below:
- misconduct or other disciplinary proceedings against the employee, including termination of employment;
  - referral to and action being taken by external agencies such as NSW ICAC, NACC, the NSW Ombudsman, ethics committees, publishers, funding agencies and other relevant agencies; and/or
  - legal action against the individuals concerned
  - reputational damage to UNSW, affecting students, staff and partnerships.

**Effective:** 25 June 2025

**Responsible:** Chief People Officer

**Lead:** Director, Employee Relations

## Appendix 1

### Legislative compliance

This policy is intended to ensure that UNSW complies with the:

1. [Independent Commission Against Corruption Act 1988 \(NSW\)](#)
2. [Public Interest Disclosures Act 2022 \(NSW\)](#)
3. [University of New South Wales Act 1989 \(NSW\)](#)
4. [National Anti-Corruption Commission Act 2022 \(Cth\)](#)
5. [Privacy and Personal Information Act 1998 \(NSW\)](#)
6. [Foreign Influence Transparency Scheme Act 2018 \(Cth\)](#)

### Supporting documents

- [Disclosure of Interests Form](#)
- Guidelines published by the Research Integrity Unit: *'Conflict of interest – Recognising and managing conflict of interests in research'*.
- [Guidelines to Counter Foreign Interference in the Australian University Sector](#)
- [National Institute of Health Financial Conflict of Interest \(FCOI\)](#).

### Related documents

- [Code of Conduct and Values](#)
- [Complaints Management and Investigation Policy and Procedure](#)
- [Third-party Arrangements Manual](#)
- [Finance Policy](#)
- [Fraud and Corruption Prevention Policy](#)
- [Gifts and Benefits Policy](#)
- [Gifts and Benefits Procedure](#)
- [Gift Acceptance Policy](#)
- [Intellectual Property Policy](#)
- [Paid Outside Work by Academic Staff Policy](#)
- [Recruitment and Selection Policy](#)
- [Privacy Policy](#)
- [Public Interest Disclosure \(Whistleblowing\) Policy and Procedure](#)
- [University of New South Wales \(Professional Staff\) Enterprise Agreement](#)
- [University of New South Wales \(Academic Staff\) Enterprise Agreement](#)

## Appendix 2

### Examples of Conflicts of Interest

Conflicts of interest may arise in the following circumstances and should be carefully considered, disclosed and appropriately managed if applicable. Examples are provided below. These examples are not exhaustive. For more information visit the [HR Hub](#) and [National Security sites](#).

#### Work undertaken outside UNSW (Paid Outside Work or Secondary Employment)

If an individual's paid outside work activities give rise to a concern that they may not be working and making decisions in the best interests of UNSW it may be considered a conflict of interest. This includes the individual not meeting their obligations to the University in terms of attendance, performance and behaviour.

Examples of where a conflict of interest may arise, and a disclosure should be made:

- A continuing academic employee is lecturing for another University two evenings a week.
- A full-time professional employee is working each evening in their own business after they finish their daily hours working at UNSW.
- An employee is working for another organisation during the same hours they are being compensated at UNSW.

#### Unpaid or voluntary work

Whilst unpaid or voluntary work may not normally be considered secondary employment, a conflict of interest may still arise and this type of work should be disclosed and managed. This would also include unpaid professional activities such as where staff sit on committees of professional societies or associations.

#### Financial interests

A financial interest is an interest that gives you financial returns or the possibility of a financial return. A conflict may arise where an individual makes, participates in, or has the ability to influence decisions that could advantage their own personal and/or financial interests or affiliations. Money doesn't need to exchange hands for an interest to be financial.

Financial interests may include investments, ownership or directorship of external businesses, receiving commissions or the provision of goods and services.

Examples of where a conflict of interest may arise, and a disclosure should be made:

- An employee, their relative, or close acquaintance holds a position within a business that sells, or is likely to sell, its goods or services to UNSW.
- An employee of UNSW engages a company they are a director or employee of for a consulting project at UNSW
- A supplier of goods to UNSW gives an employee who is responsible for managing the contract preferential pricing on their products for their personal use, friends and family.

#### Studying or working at UNSW - Personal and family relationships

If a staff member has a family member or other person with whom they have a relationship who is studying or working at UNSW (or applying to study or work at UNSW) in an area where they can influence their academic or employment outcome, there is a conflict of interest that UNSW needs to know about, and which needs to be managed.

## **Between staff and students**

A conflict of interest arises where a staff member has or has previously had a close personal relationship with a student for whom they have academic, administrative or other responsibilities.

Examples of where a conflict of interest may arise, and disclosure should be made:

- Holding a position on a panel that awards a scholarship to the student
- Grading assessments and exams completed by the student.

## **Between staff**

A conflict of interest may arise where an employee is working with a family member or with someone who they have a close personal relationship with.

Examples of where a conflict of interest may arise, and disclosure should be made:

- During a recruitment process where the staff member is interviewing a relative and can directly influence the selection decision.
- A staff member who has become close friends with an employee that they need to conduct a performance review for or make a disciplinary decision on.
- A researcher enrolls their partner as a participant in a study they are conducting.
- A manager, or someone who has direct influence over another employee, enters into a relationship with that employee.

## **Research and Commercialisation**

A conflict of interest arises for employees where a private interest puts at risk, or appears to put at risk, the employee's professional judgment in conducting, evaluating or reporting on research. It could impact hiring staff, the collection, analysis and interpretation of data, and disclosure of results.

Examples of where a conflict of interest may arise are:

- An employee commercialises their research into services or products that compete or conflict with UNSW's interests.
- An employee conducts research funded by an organisation that may wish to control adverse research findings as they directly benefit from the results, or be perceived to have a bias for certain outcomes.
- A researcher whose relative or close friend sits on the board of a company who is funding research conducted by that employee.
- An employee who commercialises research developed whilst working at UNSW and seeks to personally benefit from the research.
- An employee conducts research funded by a company of which they are a director or shareholder.

## **International Activity (including foreign affiliation and foreign activity)**

- For information on disclosures relating to International Activity see [Foreign Affiliation Disclosure - What you need to declare](#).

## **Other areas of conflict of interest**

Other examples where an actual, potential or perceived conflict of interest may arise include:

- Using University resources and information for personal use
- Accepting gifts or favours from existing and prospective suppliers to UNSW.

## **Acknowledgement**

Macquarie University - Conflict of Interest Policy – Annexure A Examples of Conflicts of Interest  
Australian Catholic University - Declaration of Interest Policy - Annexure A – Conflict types