



CONFLICT OF INTEREST PROCEDURE

Governing Policy:

[Conflict of Interest Policy](#)

Purpose

This procedure informs Australian Institute of Business (AIB) Staff of the process for identifying, declaring and managing perceived, potential or actual Conflicts of Interest.

Definitions

Unless otherwise defined in this document, all capitalised terms are defined in the [glossary](#).

Procedure

1. When Staff are in a situation where a conflict of interest exists, or has the potential to exist, or could be perceived or appear to exist, they must immediately disclose such interest and the potential conflict that may arise. The declaration may initially be verbal but must be then documented in writing as soon as practical:
 - (a) Members of AIB governing bodies are to disclose to the respective Chair of any (perceived) conflicts of interest prior to and during appointment on the governing body; such disclosures will be advised at the next meeting for minuting purposes and will be recorded in a Conflict of Interest Register as maintained by the governing body's secretary.
 - (b) AIB Staff are to disclose in writing as per 3.2 of the Policy, using the [Conflict of Interest Declaration form](#) provided as **Appendix A** below; disclosures will be recorded in a Conflict of Interest Register.
 - (c) Independent reviewers engaged as per the AIB Reviews Policy and Procedure will complete and provide the CEO a [Declaration of No Conflict of Interest form](#) in line with that policy and procedure; the form is provided as **Appendix B** below.
2. Where Staff are not sure if a conflict or potential conflict exists, they should raise the matter with their line manager, the relevant Chair, or the CEO.
3. When conducting business on behalf of AIB, the following guidelines will assist in determining what could be perceived as a conflict of interest:
 - 3.1. a meal or refreshments paid for in connection with a business meeting ;

- 3.2. receipt of advertising novelties, provided that they do not appreciate in value and are widely distributed to others under essentially the same business relationship with the donating party (e.g. giveaways such as pens, mouse pads and trinkets);
 - 3.3. other organisations' products made available under customer or public relations programs, such as product samples; and
 - 3.4. relationships with commercial clients where reciprocal gifts or dealings are exchanged without any inference of non-transparent or unethical conduct.
4. At all times, the overriding concept and principle must be the duty of Staff to disclose all possible conflicts, or potential conflicts, as soon as they become aware of them, when conducting business or dealings on behalf of AIB. This is the only way that transparency, honesty and integrity can be maintained.

Related Procedures

Intellectual Property Procedure
Privacy Procedure [*please see* Privacy Policy]
Reviews Procedure
Staff Code of Conduct
Staff Grievance Procedure
Whistleblower Procedure

Related Forms

[Conflict of Interest Declaration form - Appendix A](#)
[Declaration of No Conflict of Interest form – Appendix B \(*For Independent Reviewers only*\)](#)

Responsibility

Chief Executive Officer

Current Status:	V2
Approved By:	Board of Directors
Effective From:	7 February 2024
Date of Approval:	7 February 2024
Previous Versions:	2 October 2019 (<i>Conflict of Interest Procedure Version 1</i>)
Date of Next Review:	7 February 2027

Appendix A



Conflict of Interest Declaration Form

Please complete this form if you believe that you may be involved in a conflict of interest situation or if you are unsure and seek to disclose a potential or perceived conflict of interest. Please read the Conflict of Interest Policy and Procedure which are available on the [AIB Policies and Procedures](#) webpage.

The final completed form will be provided to the HR Department for the purposes of recording on the Conflict of Interest Register.

SECTION 1: PERSONAL DETAILS	
NAME:	
DEPARTMENT:	
SECTION 2: DISCLOSURE DETAILS	
The actual, potential or perceived conflict of interest relates to: <i>(tick all appropriate box/s)</i>	
<input type="checkbox"/> Relationship with family or friends	<input type="checkbox"/> Staff recruitment
<input type="checkbox"/> Outside work activities (paid/unpaid), including volunteer work	<input type="checkbox"/> Relationship with external parties
<input type="checkbox"/> Financial interest	<input type="checkbox"/> Disposal of AIB assets
<input type="checkbox"/> Gifts/benefits	<input type="checkbox"/> Procurement of goods and services
<input type="checkbox"/> Provision of external consultancy services	<input type="checkbox"/> Other (if you selected other please provide details)
<input type="checkbox"/> Provision of secondary employment, including within the education sector	_____
The following actual, potential, or perceived conflict of interest has been identified: <i>(please insert all relevant details)</i>	

The (actual, potential, or perceived) conflict is expected to last: _____ (day/months)

SECTION 3: TO BE COMPLETED BY THE AIB CEO

In my opinion the details provided: *(tick appropriate box)*

- ☐ do not constitute a conflict of interest, and I authorise the employee to continue the activity (go to Section 4).
- ☐ do constitute an actual, potential or perceived conflict of interest (please provide a detailed action plan below).

If the situation does constitute a conflict of interest, please ensure that the following actions have been considered:

- ensure all information surrounding the conflict has been disclosed and documented
- inform likely affected persons of the conflict, seeking their views where relevant as to whether they object
- reformulate the scope of work or restricting access to certain information
- recruit a third party to oversee part or all the process
- recommend relinquishing the interest that is causing the conflict
- temporarily remove the person from the process or responsibilities
- monitor the person's activities closely in relation to the conflict of interest
- take no further action because the conflict is minimal.

I have reviewed the above considerations and request that the Employee takes the following action to eliminate/manage the conflict:

I will ensure this action plan is reviewed:	
<input type="checkbox"/> Within 1 month	<input type="checkbox"/> Within 3 months <input type="checkbox"/> Within 6 months
<input type="checkbox"/> Within 12 months	<input type="checkbox"/> Other – specify above <input type="checkbox"/> N/A: the conflict is one-off
SECTION 4: EMPLOYEE’S DECLARATION	
<p>To the best of my knowledge and belief any actual, perceived or potential conflicts between my duties as an employee and my private and/or business interests have been fully disclosed in this form in accordance with the requirements of the AIB Conflict of Interest Policy.</p> <p>I acknowledge, and agree to comply with, any approach identified in this form for removing or managing an actual, perceived or potential conflict of interest.</p> <p>SIGNATURE: _____ DATE: _____</p>	
SECTION 5: AUTHORISATION	
<p>The actions described in the approach outlined in Section 3 have been put in place to effectively manage any actual, potential or perceived conflict of interest disclosed in Section 2. The approach outlined in Section 3 ensures that AIB’s public interests and reputation is adequately protected.</p> <p>NAME/TITLE: _____</p> <p>SIGNATURE: _____ DATE: _____</p>	

Appendix B



No Conflict of Interest Declaration by Independent Reviewer

AIB Review of (review title)

(date of review)

No Conflict of Interest Declaration by Independent Reviewer

I, _____ (name of reviewer) on _____ (date)

declare that I to the best of my knowledge consider that

- I am not a member of any AIB governance or management bodies
- I have not been an employee of or had a business relationship with AIB within the last three years
- I do not have a direct or indirect material financial interest with AIB
- I am impartial to and disconnected from AIB day-to-day operations
- I am free of any interest, position, association or relationship that might influence, or reasonably be perceived to influence, my capacity to exercise independent judgement and
- I have no conflict of interest with the terms of reference and scope for the AIB review of (review title).

Signed: _____

Dated: _____

Signature of Witness: _____

Name of Witness: _____

Address of Witness: _____

Dated: _____