Conflict of Interest Policy

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Purpose

This policy sets out the principles, responsibilities, and procedures for identifying, disclosing, and managing actual, potential, and perceived conflicts of interest at The Institute of International Studies (TIIS). It aims to preserve institutional integrity, ensure transparency in decision-making, and maintain the confidence of stakeholders, including students, staff, partners, and regulators.

Scope

This policy applies to the following individuals associated with The Institute of International Studies (TIIS) Pty Ltd:

- All members of the Board and its subcommittees
- All executives, academic, and professional staff
- Contractors, consultants, and other third parties acting on behalf of TIIS
- Any individual engaged in governance, management, academic, or administrative activities within TIIS

The policy addresses **actual, potential, and perceived conflicts of interest** in both **financial and non-financial** contexts, including but not limited to personal, professional, academic, or institutional interests that could improperly influence decision-making, responsibilities, or actions.

Policy Statement

TIIS is committed to ensuring that its operations are conducted with integrity and that all decisions are made in the best interests of the institution. All personnel must:

- Avoid situations where personal interests conflict with institutional responsibilities
- Declare all actual, potential, or perceived conflicts of interest in a timely manner
- Cooperate in the management or resolution of any conflicts

No person with a conflict of interest should participate in decision-making related to the matter in question.

Definitions

- **Conflict of Interest**: A situation where a personal, financial, professional, or academic interest may interfere, or be perceived to interfere, with an individual's duties or the best interests of TIIS.
- **Actual Conflict of Interest**: A real conflict between an individual's personal interest and their duties.
- **Potential Conflict of Interest**: A situation that could develop into a real conflict in the future.
- **Perceived Conflict of Interest**: A situation that may appear to an external party to influence decision-making, even if no actual conflict exists.
- **Disclosure**: The formal process of declaring a conflict of interest.

Policy Principles

TIIS is committed to:

- Maintaining integrity and impartiality in all institutional decisions
- Promoting a culture of transparency and ethical behaviour
- Managing conflicts in a consistent, fair, and accountable manner
- Protecting the reputation of TIIS and its community
- Complying with relevant legislation and higher education standards

Responsibilities

Role	Responsibilities
All Staff and Board Members	Disclose any actual, potential, or perceived conflicts of interest as soon as they arise. Avoid actions or decisions that may be improperly influenced.
Managers and Supervisors	Promote awareness of this policy. Support staff in identifying and disclosing conflicts. Manage declared conflicts in accordance with this policy.
CEO and Executive Management Team	Oversee implementation and monitoring of conflict of interest processes. Review and resolve high-risk conflict cases.
Board of Directors	Disclose interests at the start of each meeting. Recuse themselves from decisions or take any other appropriate action necessary to manage a conflict of interest. Review the effectiveness of this policy.

Conflict of Interest Disclosure Guideline

1. Obligation to Disclose

All TIIS staff and affiliates must disclose any **actual, potential, or perceived conflicts of interest** as soon as they become aware of them. While initial disclosures may be made verbally, a written declaration must follow as soon as practicable to ensure proper documentation and oversight.

a. Members of TIIS Governing Bodies

Members of the TIIS Board or its subcommittees must disclose any actual or perceived conflict of interest to the respective Chair **prior to or during their appointment**, and as conflicts arise. These disclosures will be:

- Noted at the next relevant meeting for **minuting purposes**; and
- Recorded in the **Conflict-of-Interest Register** maintained by the Secretary of the relevant governing body.

b. TIIS Staff

TIIS staff must make written disclosures to the CEO, in accordance with the Conflict-of-Interest Policy. TIIS Staff may initially seek verbal guidance from a supervisor or CEO, before providing a written disclosure.

c. Independent Reviewers

Independent reviewers engaged under the TIIS Reviews Policy and Procedure must complete a Declaration of Conflict-of-Interest Form (see Appendix A) and submit it to the CEO prior to commencing a review.

2. Uncertainty About a Conflict

If staff are unsure whether a conflict (actual, potential, or perceived) exists, they must seek guidance from:

- Their **line manager**;
- The **Chair of the relevant governing body**; or
- The **Chief Executive Officer (CEO)**.

It is better to disclose and allow a formal determination to be made than to omit potentially relevant information.

3. General Guidance on Common Scenarios

When conducting business on behalf of TIIS, staff should be mindful of activities that may raise perceptions of bias or preferential treatment. The following examples are generally considered **not** to represent conflicts of interest, provided there is **no influence on decision-making** and the benefits are modest, of token value, widely distributed, or incidental:

- Meals or refreshments provided during legitimate business meetings.
- Promotional or advertising items of minimal value (e.g., pens, mouse pads, branded trinkets) that are generally distributed to all clients or partners.
- Product samples or giveaways provided under public relations or customer service programs.
- Reciprocal gifts or dealings with commercial entities where there is no suggestion of preferential treatment, coercion, or unethical behaviour.

4. Principle of Transparency

The overarching principle of this policy is the duty of all staff to disclose any situation that could be construed as a conflict of interest—whether actual, potential, or perceived—at the earliest opportunity.

Proactive and timely disclosure is critical to upholding transparency, honesty, and institutional integrity at TIIS. Failure to disclose may be considered a breach of this policy and subject to disciplinary action.

Disclosure Procedures

Identifying a Conflict of Interest

Conflicts may arise in situations including, but not limited to:

- Staff evaluating or supervising family members or close friends
- Participation in recruitment, tendering, or procurement decisions where personal relationships exist
- External consultancy or secondary employment with competitors or partners
- Supervising or examining a student with whom there is a close personal relationship
- Holding equity or investments in an organisation doing business with TIIS

Declaring a Conflict of Interest

- All actual, potential, or perceived conflicts must be declared in writing.
- Declarations must be submitted to the relevant manager or, in the case of senior staff and Board members, to the CEO or Chair of the Board respectively.

- Declarations must be reviewed at the beginning of any major project, procurement process, appointment, or meeting.

Managing a Conflict of Interest

Options for managing a conflict may include:

- Withdrawal from the decision-making process
- Reassignment of duties
- Implementation of oversight mechanisms
- Divestment of the conflicting interest
- Resignation from conflicting external roles

The appropriate response will be determined in consultation with the line manager or governance body and documented accordingly.

Conflicts of Interest Register

- All declarations by Staff and management actions, will be recorded by the CEO.
- All declarations by Board or Committee Members, will be recorded on the Conflict-of-Interest Register, maintained by the Chair of the Board of Directors.
- Periodic audits may be conducted to ensure compliance.
- Board meeting minutes will record any declared interests and actions taken.

Breaches of this Policy

Failure to disclose or appropriately manage a conflict of interest may result in disciplinary action, including:

- Formal warnings
- Removal from duties or committees
- Termination of employment or engagement
- Reporting to regulatory authorities where applicable

Related Policies

- TIIS Code of Conduct
- Conflict of Interest Declaration Form
- Conflict of Interest Register
- Corporations Act 2001 (Cth)
- Higher Education Standards Framework (Threshold Standards) 2021
- TEQSA Guidance Notes on Corporate Governance

Policy Review

This policy will be reviewed every three years or earlier as required by law or due to changes in regulatory requirements or institutional priorities.

Version History

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Authored by	CEO
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**********END OF POLICY and PROCEDURE*********