

Integrity and Standards Unit

Conflicts of Interest and Disclosure of Relationships

G U I D E L I N E S

R E C O G N I S E | D I S C L O S E | A S S E S S | M A N A G E

How to recognise, disclose, assess and manage a conflict of interest at Curtin University, with practical guidance for the Discloser and Responsible Officer.

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Introduction

Conflicts of Interest (COI) are a normal part of working in a large university. The key is to recognise and disclose an interest early so it can be independently assessed and managed.

Who these Guidelines are for?

- The **Discloser**: to recognise whether a COI exists and how to disclose;
- The **Responsible Officer (RO)**: to assess a disclosure and decide how it should be managed; and
- The **Integrity and Standards Unit (ISU)**: to advise on disclosure management and administration.

The process at a glance:

Step	What happens	Where to look
1. Recognise	Identify whether a COI exists and what type of activity it relates to.	Part 1
2. Check	Use the test and self-check tools to work out whether a COI exists.	Part 2
3. Disclose	Disclose as soon as possible through the online Disclosure of Relationships and Interests form.	Part 2
4. Assess & Manage	The RO assesses the disclosure and, where a conflict exists, sets out a management strategy.	Parts 2 & 3
5. Record & Review	The strategy is recorded via the online Disclosure of Relationships and Interests form with a copy provided to the Discloser. Note: Each disclosure must be reviewed after 12 months.	Part 3

Quick finder

Your situation	Where to look
A gift, benefit or hospitality	Part 1.2
A relative, partner or close friend at work	Part 1.1 items B, C and L
A supplier, tender or contract	Part 1.1 items A, E and I
Research funding, sponsors or commercialisation	Part 1.1 items A and F
A board seat, directorship or outside role	Part 1.1 items A and G
Building, construction or property projects	Part 1.3 item D
Secondary employment or private consultancy	Part 1 item G
Deciding whether something is a conflict	Part 2
Managing a conflict (Responsible Officer)	Part 3

Out of Scope:

Council members do not disclose COIs under these Guidelines. Their requirements are set out in the Curtin University Act 1966 (WA) and Council governance instruments, including the Council Standing Orders. Council members must still disclose foreign relationships and interests.

Foreign relationships and interests are a separate disclosure category. It must be disclosed whether they involve another type of COI and assessed against the relevant laws and guidelines (see the Procedures and the Foreign Risk resources).

Gifts, benefits and hospitality: These guidelines address situations related to Curtin staff accepting a gift, benefit or hospitality which creates an actual, perceived or potential COI. For guidance on use-of-funds for giving gifts on behalf of the University, refer to [Hospitality, Gifts, Donations and Prizes Procedures](#)

PART 1: Recognising a conflict of interest

Part 1 covers types (categories) of COI (items A to L) and the University functions where they commonly arise (items A to D). *Note:* the functions are not categories of COI; they show where they arise.

1.1 Types of conflict of interest

A. Financial interests

Arising where an individual makes, participates in, or can influence decisions that could advantage their own personal or financial interests or personal affiliations. Such interests may include investments, ownership or directorship of external entities, consultancies, the provision of goods or services, or the receipt of royalties or other considerations connected to Curtin activity.

Examples may include where an individual:

Contracts, suppliers and tenders

- has a financial interest in an external entity and holds a position that could influence, or be perceived to influence, the awarding of contracts to that entity.

Outside entities, directorships and University property

- holds a directorship or executive position in an external entity that can exert significant influence over the University, or that the University is bidding with or against for contract research funds.

Teaching, private work and outside income

- controls the designation of course materials and is also the author or developer of those materials.

Research funding and University funds

- chairs a committee allocating internal research funding, where funding is granted to the Chair's own school or department.

In short. A conflict arises whenever an individual's University role allows them to influence a decision that could ultimately benefit them, someone close to them, or an organisation they are connected with.

B. Close personal relationships between individuals

Arises when an individual participates in or can influence decisions affecting another individual with whom they have or have had a close personal relationship.

Examples may include where an individual:

- sources or recommends a person with whom they have a close personal relationship for a position or work outside normal recruitment, selection or procurement practices.
- is placed in a supervisory role over someone with whom they have or have had a close personal relationship.
- a panel member who has a close personal relationship with a candidate, or another conflict, must disclose it to the Chair as soon as they become aware of it; if unsure whether a conflict exists, they should seek the Chair's advice before participating.

C. Close personal relationships between individuals and students

Arises where an individual has or has had a close personal relationship with a student for whom they hold academic, administrative or other responsibilities.

Examples may include where an individual:

- Has a familial or personal relationship with a student who enrolled in a unit that they either coordinate or teach into.
- Has a familial or personal relationship with a student and work within a position with access to student results or teaching materials relevant to that student's enrolment.

D. Personal views of individuals towards others

Arises where an individual has, or is perceived to have, a personal view of another person or group that could reasonably be expected to prevent them from performing their responsibilities objectively and impartially. This includes feelings of friendship (amity), or of hostility, rivalry or contention (enmity).

E. Gifts, benefits and hospitality

Arises when an individual solicits or accepts gifts, benefits, or hospitality ("gifts") in connection with their employment or engagement from a person or entity that could influence them in their official capacity.

Golden rules

- If in doubt, politely decline.
- Never accept a gift of any value from a supplier during a current tender or procurement process.
- Never accept money.
- If a gift appears intended to influence you, notify the ISU, whether or not you accepted it.
- If you accept a gift as part of normal University business, disclose it through the Disclosure of Gifts, Benefits and Hospitality form.

F. Sponsorships and other agreements

Arises where an individual receives or is offered discounted or free goods or services, or contra (exchanged) items, under a sponsorship or other agreement.

- Contracts with preferred suppliers may produce similar benefits, for example, free equipment from sales reward points, or discounted travel based on the volume of sales.
- These benefits are not gifts to individuals. They are automatically University property, obtained under a formal agreement. They should nonetheless be recorded as perceived or potential conflicts of interest, regardless of value.

Where such benefits cannot be removed, the RO should consider, in priority order: declining and returning the items; allocating them for university business or purposes only; or, as a last resort, making them available to the University community on an equitable basis.

G. Secondary employment

Arises where an individual's secondary employment creates or appears to create a situation in which they may not be acting in the university's best interests or may not be giving the university their full commitment in attendance, performance or behaviour.

Examples of secondary employment:

- Is undertaken during hours for which the individual is paid by the University.
- Uses any University facility, equipment or resource, including software and IT resources.
- Benefits from commercial or other information the individual holds by virtue of their university role.
- Occurs within an organisation that competes with the University.
- Occurs within an organisation that supplies the University or is a customer.
- Involves advising University students or employees on behalf of the other employer or otherwise allows outside considerations to affect University decisions.

All private consultancies, including those undertaken for the University in a private capacity, must be disclosed as a COI in accordance with the Consultancy Procedures. Unpaid or voluntary work is generally not secondary employment, but conflicts may still arise.

H. Use of University facilities and equipment

Arises when an individual uses University resources for personal financial gain, for political purposes, or for any illegal or prohibited reason.

I. Use of official information

Arises when an individual uses information obtained through their duties, particularly confidential or sensitive information, to gain an improper advantage or financial benefit for themselves or another person or entity.

J. Personal beliefs

Arises where an individual is required to perform official duties that are at variance with their strongly held personal values.

K. Public comment

Arises where an individual, in the course of a private activity, makes public comment that purports to represent, or may be perceived as representing, the views of the University.

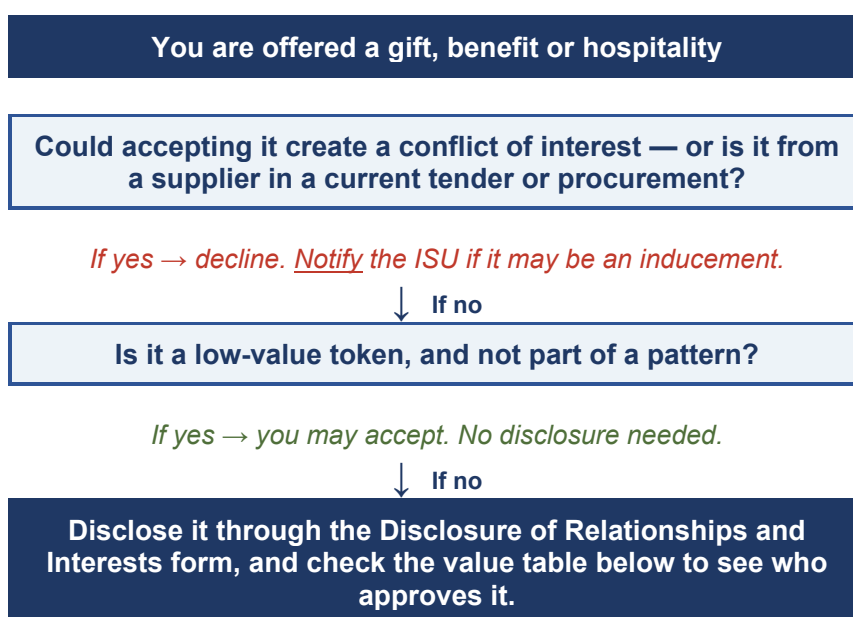
- All individuals have the right, as citizens, to comment publicly on matters of public interest.

However, statements made in that context should not suggest that the views are those of the University. Public comment includes speaking engagements, comments and letters to the media, books, journal articles, notices, and electronic and social media likely to reach the wider community.

L. Multiple roles (conflict of duty)

Arises where an individual holds multiple roles, within or in addition to their substantive University appointment, that conflict with the responsibilities of each role.

1.2 What to do when you are offered a gift



Gifts that should never be accepted include:

- gifts in kind that a reasonable observer would consider excessive (for example, free or discounted accommodation, meals, travel, entertainment, gift cards, loans, commissions or expense reimbursements), including such gifts provided to a person with whom the individual has a close personal relationship;
- gifts associated with procurement; where the University is in a tender or procurement process, no gift of any size should be accepted from any potential supplier or associated party, and money must never be accepted (see also items 1 and 14); and
- facilitation gifts, that is, gifts intended to induce or thank an individual for expediting a transaction, or for giving preference to a party in normal University business.

Token gifts. An individual may receive token gifts that it would be discourteous to decline, such as culturally appropriate gifts, souvenirs, mementos, low-value symbolic items, or modest hospitality when developing a working relationship. Receiving a token gift is not, in itself, a COI, although a continuing pattern may amount to one. Where a token gift is valuable, it should be declined; if unsure, the individual should seek advice from their line manager or the ISU.

When should an accepted gift be registered?

Value of the gift	Disclose via the Disclosure of Gifts, Benefits and Hospitality form?	Who must approve acceptance?
\$150 or less	No — unless the cumulative rule below applies	No approval needed
Over \$150 to \$300	Yes	Line manager (or nominee) (RO)
Over \$300	Yes	Executive Manager (RO)
More than \$300 from one source within 12 months	Yes — once the total reaches \$300	Executive Manager (RO)
Value unknown	Decline if you can; if not, estimate value and disclose	Appropriate RO based on estimated value
Offered to a group	Each person discloses their share	Per above

Note 1: When disclosing a gift, identify it as a gift, benefit or hospitality, not as a COI.

Note 2: These dollar limits apply in all University-business situations, including when working interstate or overseas, or while on business travel.

1.3 Conflicts by business function, area or portfolio

The functions below show how the conflicts of interest in section 1.1 commonly arise. They are functions, not categories of a conflict. A disclosure is made the same way in every case, through the online [Disclosure of Relationships and Interests form](#). What differs is how the RO manages the conflict, and who can provide specialist advice. For detailed worked examples and sample assessment notes in each process, see the separate area guideline noted under it.

A. Research

Arises for researchers with a competing private interest which could compromise the researcher's professional judgement in conducting, evaluating or reporting on research. It may affect the collection, analysis, and interpretation of data; the hiring of staff; the procurement of materials; the sharing of results; the choice of licensees or protocol; the involvement of human subjects; or the use of statistical methods.

Managing the conflict. The RO may restrict the researcher's involvement in the affected decisions, arrange independent oversight or monitoring of the project, disqualify the researcher from part or all of the sponsored work, or apply another strategy set out in Part 3: Managing a conflict of interest.

For case studies and management strategies refer to [COI in Research](#) practical examples.

B. Procurement

Arises when an individual involved in sourcing, specifying, evaluating, selecting, approving, or managing suppliers, contracts, or tenders has a competing private interest that could improperly influence, or be perceived to influence, the outcome.

Managing the conflict. These conflicts are usually managed by recusal or restriction, an independent evaluation panel, or probity oversight on higher-value or higher-risk procurements (see Part 3: Managing a conflict of interest).

For case studies and management strategies refer to [COI in Procurement](#) practical examples.

C. People and Culture (PAC)

Arises where an individual participates in, or can influence, decisions about recruitment, selection, promotion, transfer, reclassification, remuneration, performance, development, discipline, grievance or termination affecting a person with whom they have a competing private interest, most often a close personal relationship.

Managing the conflict. These conflicts are usually managed by removing the individual from the panel or process, recusal, or substituting an independent decision-maker (see Part 3: Managing a conflict of interest). Where a panel Chair is conflicted, the matter is referred to the Chief People Officer.

For case studies and management strategies refer to [COI in People and Culture](#) practical examples.

D. Capital Works

Arises where an individual involved in the planning, design, specification, tendering, award, certification, or management of capital projects, contractors, consultants, or property transactions has a competing private interest that could improperly influence, or be perceived to influence, the outcome.

Managing the conflict. These conflicts are usually managed by recusal or restriction, independent technical evaluation, and probity oversight on major projects (see Part 3).

For case studies and management strategies refer to [COI in Capital Works](#) practical examples.

PART 2: Determining whether a conflict exists

This Part should be used by the individual when deciding whether to disclose and by the RO when assessing a disclosure. It applies to conflicts of interest only; foreign relationships and interests are assessed separately, against the relevant laws and guidelines.

2.1 The test

Would a reasonable disinterested observer think that an individual's competing private interests conflict, appear to conflict, or could conflict in the future with the individual's duty to act in the University's best interests?

The three limbs of the test correspond to the *actual*, *perceived* and *potential* conflicts defined in the COI & DOR Policy and Procedures: a conflict that exists now, one that appears to exist, and one that may arise in the future. Note, you do not need to have acted on an interest, or even intend to, for a conflict to exist.

2.2 Quick self-check

Work through the questions below. Each comes with a short example. Tick any that apply to you.

Tick	Ask yourself — and consider the example
☐	1. Could you, or someone close to you, gain or lose from a decision or action you are involved in, now or in the future? <i>Example: you help choose a supplier, one of the bidders is a company a family member works for.</i>
☐	2. Do you have a current or past personal, professional or financial relationship of any significance with someone affected by the matter? <i>Example: you are reviewing the work of a former business partner.</i>
☐	3. Could you, or someone you have a close personal relationship with, gain or lose financially in some way? <i>Example: you approve payments, one of them would go to a relative.</i>
☐	4. Have you been involved in this matter privately, outside your university role? <i>Example: you advised one of the parties in a private capacity before it reached you.</i>
☐	5. Have you received a gift, benefit or hospitality from someone who stands to gain or lose from your decision? <i>Example: a contractor who is bidding for work covered the bill at a recent dinner.</i>
☐	6. Are you a member of, or affiliated with, a club, association or organisation — or connected to people — that stands to gain or lose from your decision? <i>Example: you sit on the board of a not-for-profit that is applying for university funding.</i>
☐	7. Could the situation affect your own future employment prospects outside your current role? <i>Example: you are negotiating with a company you are hoping to work for one day.</i>
☐	8. Would you be comfortable if this were reported on the front page of a newspaper or shared on social media? <i>Example: picture the decision, and your interest in it, described in a news story — would it still look acceptable?</i>

Ticked one or more, or unsure? Disclosing does not mean you have done anything wrong; it simply allows the matter to be assessed and, if needed, managed. If in doubt, disclose.

2.3 Worked example

Sam is on a tender evaluation panel. One of the companies bidding is run by Sam's brother-in-law. Sam has no financial stake in the company and is confident of being objective. Applying the test, a reasonable, disinterested observer could still think the family relationship appears to conflict with Sam's duty to assess the bids impartially (questions 1 and 2). The conflict may only be perceived, but that is enough. Sam discloses it through the form. The Responsible Officer assesses the disclosure and, using Part 3, removes Sam from evaluating that particular bid while allowing Sam to continue with the rest of the panel's work.

Part 3: Managing a conflict of interest

Once a COI has been disclosed, the RO chooses a strategy to manage it, records it, and provides a copy to the Discloser. There are five (5) strategies which apply to everyone situation.

3.1 Choosing a strategy

The Responsible Officer's choice of strategy should take account of:

- the nature of the conflict of interest;
- the seriousness of the conflict — its risk and significance;
- the operating environment;
- legal requirements; and
- general practicality.

More than one strategy may be used together. Where a strategy involves changing an individual's duties, reporting line or employment, it should be carried out in consultation with People and Culture and within the relevant employment frameworks. For foreign relations and interests, strategies are applied alongside the relevant laws and guidelines.

3.2 The five strategies at a glance

Strategy	What it involves	Typically used when
A. Restrict	Limit the individual's involvement.	The conflict is occasional, and the individual can be kept away from the affected areas.
B. Recruit	Bring in an independent person.	The conflict is more significant, but the individual should not, or need not, step away.
C. Remove	Remove the individual from all duties.	The conflict is ongoing and serious, and restrictions or oversight alone are not enough.
D. Relinquish	The individual gives up the interest.	The individual is willing to give up the interest. Often paired with Remove.
E. Resign	The individual steps down.	A last resort, where nothing else works, and the conflict is high-risk.

3.3 The five strategies in detail

A. Restrict

Restrictions are placed on the individual's involvement in the matter.

Suitable when:

- the individual can be effectively separated from the parts of the activity or process that give rise to the conflict; and
- the conflict is not likely to arise frequently.

Examples:

- stepping out of the discussion and not voting on the matter (for example, leaving a committee meeting while an item the individual has an interest in is considered);
- not taking part in particular proposals, plans or tasks connected to the conflict; or
- limiting the individual's access to the information or documents relating to the conflict.

In practice. Sam, from the worked example in Part 2.3, is restricted from scoring the bid submitted by their brother-in-law's company but continues to assess the other bids.

Multiple roles (conflict of duty). Where a conflict arises from an individual holding multiple incompatible or competing duties as an officer of the University, an upfront package of restriction measures may be needed.

These may include:

- a letter or agreement between the University and the other party relieving the individual of the duty to disclose particular information to either party;
- ensuring relevant minutes always record the conflict and the agreed mitigations;
- redacting certain information from papers, agendas and minutes; excluding the individual from certain functions, such as contract negotiation or advising on University position or policy proposals;
- agreeing on what information the individual may access and discuss; and
- arranging access to legal advice where the individual is concerned about the appropriateness of the mitigations or their duties with the other party.

B. Recruit

A disinterested third party is brought in to oversee part or all of the process that deals with the matter.

Suitable when:

- the effects of the conflict on the proper performance of the individual's role are more significant and need proactive management;
- it is not appropriate or desirable for the individual to remove themselves from the decision; or
- those likely to be concerned about the conflict have been consulted and do not object to the individual's continued involvement.

Not suitable when:

- the conflict is serious and ongoing, so ad hoc recruitment of others is unworkable;
- recruiting a third party is not appropriate for the proper handling of the matter; or
- a suitable third party cannot be found.

Examples:

- arranging for the affected decision to be made by an independent third party;
- engaging an independent third party or probity auditor to oversee or review the integrity of the decision-making process;
- increasing the number of people on a decision-making committee to balance the influence of a member who has a conflict but has good reason to remain; or
- having independent reviewers monitor a research project.

In practice. *A panel member has a minor, declared interest that does not warrant removal, so a probity advisor is engaged to oversee the tender evaluation.*

C. Remove

The individual is removed from all duties related to the conflict, for as long as it exists.

Suitable when:

- the conflict is ongoing and serious, and ad hoc restriction or recruitment of others is not feasible or appropriate.

Not suitable when:

- the conflict, and its potential or perceived effects, are low risk or low significance;
- the individual is prepared to relinquish the relevant private interest (see strategy 4); or
- the affected duties would simply be reallocated to another officer whom the individual supervises.

Examples:

- removing the individual from setting and marking a particular student's assessment;
- removing the individual from the supervision and assessment of a PhD student;
- removing the individual from a staff selection or promotions panel;
- re-arranging the individual's duties to a non-conflicting function;
- transferring the individual to another project or area;
- changing the individual's reporting line; or
- disqualifying an investigator from part or all of a sponsored research project.

In practice. A supervisor who has a close personal relationship with a PhD candidate is replaced as that candidate's examiner.

Where possible, removal should be considered together with relinquishment.

D. Relinquish

The individual gives up the private interest that is creating the conflict with their university duties.

Suitable when:

- the individual is willing to give up the relevant private interest.

Not suitable when:

- the individual is unable or unwilling to give up the interest; or
- the conflict, and its potential or perceived effects, are low risk or low significance.

Examples:

- giving up privately held shares, a club or association membership, or a company directorship;
- selling a private interest at market value to an unrelated party (an arm's-length sale);
- giving up a financial interest in a research sponsor; or
- ending the relationship between the researcher and the research sponsor.

In practice. A researcher sells their shares in the company sponsoring their study before the project proceeds.

E. Resign

The individual resigns, temporarily or permanently, from their position at the University.

Suitable when:

- as a last resort, where the conflict cannot be resolved in any other workable way; and
- the individual cannot or will not give up the conflicting interest, changes to their duties or work environment are not feasible, and the conflict (and its potential or perceived effects) is high risk or high significance.

Not suitable when:

- the conflict, and its potential or perceived effects, are low risk or low significance; or
- other options exist that are workable for both the individual and the University.

Examples:

- resigning from the position at the University that gives rise to the conflict; or
- taking early retirement, where that option is feasible and available.

In practice. *A senior officer's outside directorship is incompatible with their university role and cannot be given up, so they step down from the University position.*

Recording and reviewing the strategy

The RO records the chosen strategy via the Disclosure of Relationships and Interests form, which provides a copy to the Discloser. The strategy is then reviewed and monitored annually to ensure it remains effective, and a new strategy is developed if it no longer addresses the conflict.

Related documents and useful links

[Conflicts of Interest and Disclosure of Relationships Policy](#)
[Conflicts of Interest and Disclosure of Relationships Procedures](#)
[Disclosure of Relationships and Interests form](#)
[Disclosure of Gifts, Benefits and Hospitality form](#)
[Risk, Compliance and Audit — staff portal](#)
[Consultancy Procedures](#)
[Foreign relationships and interests — IRAS / Foreign Risk resources](#)
[Australian Code for the Responsible Conduct of Research](#)
[Curtin University Act 1966 \(WA\) and Council Standing Orders](#)
[Enterprise Bargaining Agreement](#)
[Foreign Influence Transparency Scheme Act 2018 \(Cth\)](#)

Document control

Field	Detail
Document title	Conflicts of Interest and Disclosure of Relationships: Guidelines
Document type	Guidelines (supporting the Conflicts of Interest and Disclosure of Relationships Policy and Procedures)
Sponsor	Andrew Wait, Director, Risk, Compliance & Audit
Author	Zain Ul Abedeen, Risk and Compliance Coordinator, Risk, Compliance & Audit
Approved by	Andrew Wait, Director, Risk, Compliance & Audit
Contact	Joel De Silva, Manager, Integrity and Standards Unit
ISU email	conflictsofinterest@curtin.edu.au (for all declarations of interest, including gifts, benefits and hospitality)
ISU website (public)	www.curtin.edu.au/integrityandstandards
RCA staff portal	staffportal.curtin.edu.au/governance/risk-compliance-audit

Version history

Version	Date	Owner	Summary of changes
0.1 (draft)	Jun 2026	RCA	Consolidation of the former Appendices 1–3 (the conflict-of-interest types, the test for whether a conflict exists, and the five management strategies) into a single Guidelines document, aligned to the DORI Policy and Procedures

Supersedes the former Conflict of Interest Procedures Appendix 1 (v1.3, 2017), Appendix 2 (v1.0, 2015) and Appendix 3 (v1.1, 2016).

Contact and feedback

For advice on a COI, a disclosure or these Guidelines, contact the Integrity and Standards Unit.

Integrity and Standards Unit Joel De Silva, Manager
Email conflictsofinterest@curtin.edu.au (for advice regarding disclosures of interest, including gifts, benefits and hospitality)