



Australian Government  
Department of Education

# Conflict of Interest Policy

Department of Education



## ISBN



With the exception of the Commonwealth Coat of Arms, the Department's logo, any material protected by a trade mark and where otherwise noted all material presented in this document is provided under a [Creative Commons Attribution 4.0 International](https://creativecommons.org/licenses/by/4.0/) (https://creativecommons.org/licenses/by/4.0/) licence.

The details of the relevant licence conditions are available on the Creative Commons website (accessible using the links provided) as is the full legal code for the [CC BY 4.0 International](https://creativecommons.org/licenses/by/4.0/legalcode) (https://creativecommons.org/licenses/by/4.0/legalcode)

The document must be attributed as the (Conflict of Interest Policy).

# Contents

1. Purpose .....	4
2. Date of effect .....	4
3. Application .....	4
4. Legislative framework.....	4
5. Background .....	5
6. Conflict of Interest definition and terminology .....	6
7. Common Conflict of Interest.....	6
Engaging in outside work.....	6
Recruitment and selection advisory committees .....	7
Boards and committees.....	7
Obligations in relation to lobbyists.....	7
8. Procedures for declaring personal interests.....	8
Declaration of Personal Interest by non-SES employees .....	8
Declaration of Personal Interests by Contractors, Consultants, Board and Committee Members .....	8
Declaration of Personal Interests Procedure.....	8
Declaration of Personal Interest by SES Employees .....	9
Declaration of Personal Interests by Statutory Office Holders (SOHs).....	9
9. Managing Conflict of Interest .....	10
10. After leaving the department.....	10
11. Further information.....	11
12. Document particulars.....	12
Document review and change.....	12
Attachment A – Self Assessment Checklist.....	13
Attachment B – Declaration of Personal Interests Form (Non-SES).....	14
Attachment C – Declaration of consent by immediate family member to the disclosure of their personal, financial, and other interests.....	16
Attachment D – Contractor or Consultant Declaration of Personal Interests Form .....	18
Attachment E – Committee proceedings and conflict of interest.....	20

# 1. Purpose

- 1.1. This policy provides guidance to workers to disclose, and take reasonable steps to avoid, conflicts of interest in connection with their Australian Public Service (APS) employment.
- 1.2. Conflicts of interest (Col) arise when public officials are influenced, or appear to be influenced, by personal interests when doing their job.
- 1.3. Where a personal relationship or interest conflicts, may be perceived to be in conflict, or has the potential to conflict with a worker's official duties, the interest must be disclosed, and steps taken by the manager and worker to address the conflict.
- 1.4. Real or apparent Col that are not disclosed may amount to a breach of the APS Code of Conduct and be subject to a formal investigation and sanctions. Serious Col breaches may also result in the initiation of criminal proceedings.

# 2. Date of effect

- 2.1. This policy is effective from 1 July 2022.

# 3. Application

- 3.1. This policy applies to all workers engaged by the department, including:
  - all ongoing and non-ongoing Senior Executive Service (SES) and non-SES employees
  - contractors and consultants engaged by the department
  - boards, committee, and panel members, including grant assessors and external advisors working for the department.

# 4. Legislative framework

- 4.1. This policy should be read in conjunction with:
  - Public Service Act 1999
  - Public Service Regulations 1999
  - Crimes Act 1914
  - Criminal Code Act 1995
  - Public Governance, Performance and Accountability Act 2013

- Foreign Influence Transparency Scheme Act 2018
- [Australian Government's Lobbying Code of Conduct](#)
- Australian Government's Register of Lobbyists
- Accountable Authority Instructions
- Recognising potential conflicts of interest fact sheet
- Managing conflicts of interest fact sheet

## 5. Background

- 5.1. The APS Code of Conduct (Section 13(7) of the *Public Service Act 1999*) requires all APS employees to disclose, and take reasonable steps to avoid, any CoI (real or apparent) in connection with their APS employment.
- 5.2. Failure to disclose a CoI may amount to a breach of the Code of Conduct and be subject to a formal investigation.
- 5.3. The *Public Service Regulations 1999* set out obligations for employees not to disclose any information about public business or anything of which the employee has official knowledge. Under the *Crimes Act 1914*, it is an offence for a worker to publish or communicate such information.
- 5.4. Part 7.3 (Fraudulent Conduct) of the *Criminal Code Act 1995* covers a range of offences which relate to knowingly providing false or misleading information to a Commonwealth Agency. Failing to disclose a real CoI could be considered as knowingly providing misleading information and therefore a breach of the *Criminal Code Act 1995*.
- 5.5. The Accountable Authority Instructions – Disclosure of Interests (1.7) issued under the *Public Governance, Performance and Accountability Act 2013* (Section 29) places a duty on all workers to disclose interests relating to the affairs of the department so as to not undermine the confidence and trust in dealings with the department, and the Commonwealth more broadly.

## 6. Conflict of Interest definition and terminology

- 6.1. A Col is a circumstance which places a worker in a position where their personal interests (including those of their immediate family<sup>1</sup> – to the extent known and close acquaintances) could compromise their ability to undertake official work independently.
- 6.2. Situations where a worker has private interests which improperly influence or may improperly influence the performance of their public duties and responsibilities could be considered a Col. A Col can arise from gaining personal advantage or avoiding personal loss, whether financial or otherwise.
- 6.3. A Col can be real or apparent.
- 6.4. A **real** Col occurs where there is a clear conflict between the public duty and personal interests of a worker that improperly influences the worker in the performance of their duties<sup>2</sup>.
- 6.5. An **apparent** Col occurs where it appears a worker's personal interests could improperly influence the performance of their duties, but this is not in fact the case<sup>3</sup>.

## 7. Common Conflict of Interest

- 7.1. The department's Recognising potential Col fact sheet and the Self-Assessment Checklist (Attachment A) can assist workers to identify if they have an interest requiring declaration.
- 7.2. It is not possible to anticipate all circumstances that may be considered a Col, however the following are common scenarios where workers must seriously assess their personal interest in the context of this policy.

### Engaging in outside work

- 7.3. Workers must not engage in activities outside of work that may lead to a perception of real or apparent Col by the public or interested parties.
- 7.4. It is the responsibility of workers who intend to engage in outside work (including running their own business and voluntary work), to seek prior approval for that work from their manager. Real or apparent conflicts must be declared. Further information is available in the Outside Work Policy.

---

<sup>1</sup> The term 'immediate family members' applies to spouses and dependent children. Section 5.2.22, Conflict of Interest, APSC ([Section 5: Conflict of Interest | Australian Public Service Commission \(apsc.gov.au\)](#))

<sup>2</sup> Conflicts of Interest ([Section 5: Conflict of Interest | Australian Public Service Commission \(apsc.gov.au\)](#))

<sup>3</sup> Conflicts of Interest ([Section 5: Conflict of Interest | Australian Public Service Commission \(apsc.gov.au\)](#))

## Recruitment and selection advisory committees

- 7.5. Where a selection panel member has a relationship (personal or professional) with an applicant that might give rise to a Col, it should be declared to the Chair and any other selection panel member/s (or to the delegate and other selection panel members if the chair is making the declaration) prior to the application due date. A decision should be made to determine whether the selection panel member should step aside from the process or the consideration of a particular candidate.
- 7.6. If the Chair of the panel identifies that a family member, friend, or close associate has applied for the job, the Chair should immediately declare the relationship to the Delegate and identify an alternative decision maker.
- 7.7. Where an applicant has listed a selection panel member as a referee, the panel member must provide their referee comments in writing before assessing any applications.
- 7.8. For further guidance contact the department's Health and Performance Team in People Branch.

## Boards and committees

- 7.9. The potential exists for conflicts of interest to arise in committees established by agencies where a Minister appoints the chair and/or members and the committee can significantly influence decisions. Workers also need to be mindful that their involvement on boards and committees may be sufficient to create a perception of a Col that should be addressed.

## Obligations in relation to lobbyists

- 7.10. The potential exists for conflicts of interest to arise in committees established by agencies where a Minister appoints the chair and/or members and the committee can significantly influence decisions. Workers also need to be mindful that their involvement on boards and committees may be sufficient to create a perception of a Col that should be addressed.
- 7.11. Government representatives may be approached by individuals and organisations (lobbyists), acting on behalf of others, whose purpose is to seek to influence government on a variety of issues. The Code states that government representatives must not engage with a lobbyist who is not on the Australian Government's Register of Lobbyists.
- 7.12. Government representatives are expected to comply with the Code as a professional obligation and decline to have contact with unregistered lobbyists — see [Information for Australian Government Representatives](#), and the refreshed [guidance material](#).
- 7.13. All interactions with a registered lobbyist must be recorded. Workers are required to contact the Health and Performance Team in the People Branch to have the details of the engagement documented on the DE Lobbyist Meeting Register.

## 8. Procedures for declaring personal interests

### Declaration of Personal Interest by non-SES employees

- 8.1. All non-SES employees and workers have an obligation to notify their managers of private interests, both pecuniary and personal, that present a real or apparent conflict with their official duties. If you have something to declare, a declaration (see [Attachment B](#)) must be completed.
- 8.2. All declarations must be forwarded to People Branch for assessment and to be placed on the worker's personnel file. Workers should retain a copy of their disclosure for their own records. If the disclosure relates to a contractor or consultant, a copy should be stored in the relevant HPE Content Manager file.

### Declaration of Personal Interests by Contractors, Consultants, Board and Committee Members

- 8.3. Managers responsible for engaging contractors or consultants to the department must ensure the contractor or consultant is aware of the department's policy on managing Col prior to commencing with the department. This is done via:
  - the contract manager/supervisor providing a copy of the Fraud Control Policy, Col Policy and 'Fraud Responsibilities Form' to the contractor or consultant
  - the contractor or consultant completing the 'Fraud Responsibilities Form' and Declaration of Col for Contractors and Consultants, see (Attachment D), and returning to the contract manager/supervisor to upload it in the electronic 'New Starter Registration Request'
  - the contract manager/supervisor recording this in the relevant HPE Content Manager file.
- 8.4. Committees and boards should establish Col procedures set out in the Committees' Operational Guidelines, Terms of Reference which are addressed as a standing item on the agenda for continuous disclosure purposes. The Secretariat function should ensure that Col disclosures and management action are registered and regularly reviewed. The Committee proceedings flowchart (Attachment E) provides further guidance.

### Declaration of Personal Interests Procedure

- 8.5. The self-assessment checklist at Attachment A can assist workers to determine whether they have an interest to declare.
- 8.6. If an interest is identified (see Attachment A), the Declaration of Personal Interests Form (Attachment B), Declaration of Consent by Immediate Family Members (Attachment C) to Disclose Personal Interests Form, or Contractor or Consultant Declaration of Personal Interests Form (Attachment D) must be completed and forwarded to the worker's Manager and Assistant Secretary.



- 8.7. The manager must assess the disclosure and have discussions with the worker to ascertain whether there is a real or apparent conflict. Based on this information, action taken to manage the conflict must be noted including the reasons for the decision.
- 8.8. All declarations must be forwarded to People Branch for assessment and to be placed on the worker's personnel file. Workers should retain a copy of their disclosure for their own records. If the disclosure relates to a contractor or consultant a copy should be stored in the relevant HPE Content Manager file.

## Declaration of Personal Interest by SES Employees

- 8.9. SES employees are required to submit an SES Declaration of Personal Interest form on commencement with the department and on an annual basis. Declarations must also be submitted where:
- there is a change in their responsibilities (i.e. the issues or subjects on which they are required to make decisions or give advice) or
  - there is a change in personal circumstances that could impact upon decision making or advice given or
  - they are intending on leaving the APS to join the private sector in an area that aligns closely with official duties or
  - there is an agency restructure or machinery of government changes.
- 8.10. Employees that are acting SES for greater than three months are obligated to submit an SES Declaration of Personal Interest form.
- 8.11. SES Band 1 and 2 employees should use the Declaration of Personal Interests form, and SES Band 3 employees should complete the Declaration of Personal Interests and Related Party Disclosure form. Declarations for SES are to be completed and submitted electronically through the SharePoint Survey.
- 8.12. The annual SES personal interest declaration procedure is coordinated by People Branch. For further information about this process please contact [SESmailbox@education.gov.au](mailto:SESmailbox@education.gov.au)
- 8.13. The Secretary will assess the disclosure and have discussions with the employee to ascertain whether there is a real or apparent conflict. Based on this information, action taken to manage the conflict must be noted including the reasons for the decision.
- 8.14. Completed declarations and the disclosure register are secured in the office of the Assistant Secretary, People Branch, with access limited to the Secretary and staff with a business requirement to access this information.

## Declaration of Personal Interests by Statutory Office Holders (SOHs)

- 8.15. SOHs are obliged to report their material personal interests to the Secretary as they are considered "Officials" of the department for the purposes of the *Public Governance, Performance and Accountability Act 2013*.

- 8.16. SOHs are also required to declare their relevant interests to the Minister and must do this independently of this policy.
- 8.17. SOHs must use the SOH Declaration Form to declare any material personal interests. For further information on accessing this form or the declaration process please contact [SESmailbox@education.gov.au](mailto:SESmailbox@education.gov.au).
- 8.18. An annual declaration process will be facilitated by People Branch in conjunction with the annual SES declaration process. SOHs are not obliged to complete the form unless their interests have changed since their last declaration. Parliamentary, Audit and Risk Branch will manage the completed form and provide a copy to the Secretary.

## 9. Managing Conflict of Interest

- 9.1. Once the worker declares their personal interests, it is the responsibility of the manager to work with the worker to manage any conflicts of interest. Avoiding all Col (real or apparent) is not always feasible. Where Col are apparent, they should be handled in an open and transparent way that can be understood and defended. It is important to record the action taken and the reasons for the decision on the disclosure form. Practical measures which can be taken include:
- restricting the involvement of the working in work-related matters in which they have (or are perceived to have) a Col
  - recruiting independent third parties who do not have an interest to advise on or participate with the matter
  - discussing with the worker the possibility of relinquishing assets or limiting their involvement in private interests or
  - in rare circumstances, workers may need to consider changing toles temporarily/permanently within the department.
- 9.2. Contractors and consultants are obligated to comply with this policy and are subject to the provisions contained within the engagement contract regarding ethics, use of departmental information and termination provisions contained therein.
- 9.3. Further guidance on assessing risks, mitigation strategies and examples on how to manage Col disclosures are contained in the Managing Col factsheet.

## 10. After leaving the department

- 10.1. On leaving the department, all workers are reminded of their obligations under the APS Code of Conduct not to misuse inside information gained as a result of their employment. The only exemption would be when such information is publicly available.

- 10.2. Workers who have been offered outside employment and intend on leaving the APS will still be required to take all reasonable steps to avoid CoI while they continue to work for the department. Workers must inform their manager as soon as they are offered employment, outlining any relationship between the job offered and their official duties and explain any possible CoI the offer raises. Further information to assist managers to identify post-separation risks and possible management actions are outlines in the Managing CoI factsheet.
- 10.3. There are additional restrictions on post separation employment by SES employees who leave the APS whereby they shall not, for a 12 month period, engage in lobbying government representatives on any matters on which they have had official dealings as public servants over their last 12 months of employment.
- 10.4. Separating SES employees may need to consider any obligations under the Foreign Influence Transparency Scheme. A recent designated position holder must register any activity they undertake on behalf of a foreign principal where, in undertaking the activities, the person contributes experience, knowledge, skills or contacts gained in their former position. This extends beyond the categories or 'registrable activity' (parliamentary lobbying, general political lobbying, communications activity, or disbursement activity) and includes circumstances where the recent designated position holder is employed by (or acts in any capacity for) a foreign principal at any time following their departure from their role. This obligation extends for 15 years from the date the recent designation position holder leaves the relevant position.
- 10.5. It is the responsibility of the person undertaking the activities to determine whether they are required to register. It is an offence not to register if required to do so, and penalties apply.
- 10.6. More information on post separation employment can be obtained from the APS Commission website.

## 11. Further information

- 11.1. The Australian Public Service [Ethics Advisory Service](#) is available to all APS employees, including agency heads and SES staff, who wish to discuss and seek advice on ethical issues that occur in the workplace and make sound decisions around these issues.
- 11.2. For further information about this policy email [people@education.gov.au](mailto:people@education.gov.au)

## 12. Document particulars

---

Policy Owner	People Branch
Document Status	Final
Point of Contact	Director, Health and Performance Team People, Parliamentary, Communications Division
Approver	Gemma Smith
Approval Authority	Assistant Secretary, People Branch Department of Education
Date of Approval	1 July 2022

---

### Document review and change

Version	Date	Author/s	Summary of changes	Date of next scheduled review
1.0	1 July 2022	Health and Performance	Initial Document	1 July 2023
2.0	21 March 2023	Health and Performance	Updated branding	1 July 2023

## Attachment A – Self Assessment Checklist

- | Yes                      | No                       |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Do you have a family or private business? This may include both for-profit and not-for-profit organisations.  |
| <input type="checkbox"/> | <input type="checkbox"/> | Are you involved in a business partnership?   |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you serve on any boards or committees?   |
| <input type="checkbox"/> | <input type="checkbox"/> | Are you associated with any self-managed superannuation funds, trusts, or nominee companies? If so, are you aware of the share or other security trading activities of that entity?               |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you have secondary employment?   |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you undertake any volunteer work? This may include both charitable volunteer work as well as roles on school or community boards.  |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you hold shares in a private company worth more than \$10,000 (current market value) and have duties requiring decisions on contracts with, or concessions for, that company?                  |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you or your family members have any shares worth more than \$10,000 (current market value), including holding companies and subsidiary companies?  |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you receive an income stream in excess of \$10,000 from investments?   |
| <input type="checkbox"/> | <input type="checkbox"/> | Are you responsible for making recommendations on information technology acquisitions in the department and are involved in any way with one of the major IT suppliers to the department?         |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you have a relationship with an employee of a law firm that is appearing against the department in a matter?   |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you have supervisory responsibility over an employee with whom you have a personal relationship?   |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you sit on a selection panel for a position for which an employee with whom you have a relationship is an applicant?   |
| <input type="checkbox"/> | <input type="checkbox"/> | Do you have any political affiliations or personal relationships with individuals (including lobbyists) involved in activities relevant to the department?  |
| <input type="checkbox"/> | <input type="checkbox"/> | Have you or any member of your family received any gifts in money or otherwise from a person, company or body that is likely to be directly affected by the work you undertake in the department? |
| <input type="checkbox"/> | <input type="checkbox"/> | Are you aware of any other circumstance (not covered by the above) that could be considered to give rise to a real or apparent conflict of interest?  |

If you have ticked 'yes' to any of the above, you will need to complete the Declaration of Personal Interests Form ([Attachment B](#)), Declaration of Consent by Immediate Family Members to Disclose Personal Interests Form ([Attachment C](#)) or Contractor or Consultant Declaration of Personal Interests Form, ([Attachment D](#)). Completed forms must be forwarded to [People Branch](#) for assessment and to be placed on the worker's personnel file. For contractors or consultants, a copy of the 'Fraud Responsibilities Form' (and relevant declaration) must be stored on the relevant HPE Content Manager file.

## Attachment B – Declaration of Personal Interests Form (Non-SES)

### FOR OFFICIAL USE ONLY – Sensitive: Personal

This declaration of financial and other personal interests is to be completed on commencement with the department and whenever circumstance change, by non-SES employees and workers who have identified private interests, both financial and personal, that could present a real or apparent conflict with their official duties.

On completion, this declaration must be forwarded to [People Branch](#) for assessment and to be placed on your personnel file. Please retain a copy for your own records.

Name:
Position Title:
Branch/Group:
Geographic Location:
I declare that:  <input type="checkbox"/> I am aware of my responsibilities under the APS Code of Conduct to behave honestly and with integrity, to disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with APS employment and not make improper use of (a) inside information, or (b) my duties, status, power, or authority, in order to gain, or seek to gain, a benefit or advantage for myself or for any other person.  <input type="checkbox"/> I have read and understood: <ul style="list-style-type: none"><li>- the APS-wide guidelines covering declarations of personal interests set out in <a href="#">APS Values and Code of Conduct in Practice</a></li><li>- the Department of Education Conflict of Interest Policy.</li></ul> <input checked="" type="checkbox"/> The below list of my private interests and relationships has been prepared on the basis of: <ul style="list-style-type: none"><li>- the particular roles and responsibilities of the department</li><li>- my particular roles and responsibilities within the department</li></ul> <input type="checkbox"/> I undertake to immediately inform the department of any changes to: <ul style="list-style-type: none"><li>• my responsibilities or to the issue or subjects on which I am required to make decisions or give advice.</li><li>• my personal circumstances that could affect the contents of this declaration and to provide an amended declaration/s using this pro forma.</li></ul> <input type="checkbox"/> I undertake to declare any private interests or relationships of my immediate family that I am aware of, should circumstances arise in which that they could or could be seen to influence the decisions I am taking or the advice I am giving. I understand this would require the consent of the family member.

Please list any private interests or relationships which could or could be seen to influence the decisions you are taking or the advice you are giving.

The types of interests and relationships that may need to be disclosed include real estate investments, shareholdings, trusts or nominee companies, company directorships or partnerships, other significant sources of income, significant liabilities, gifts, private business, employment, social, or personal relationships that could or could be seen to impact upon your responsibilities (refer to the [Self-Assessment Checklist – Attachment A](#)).

<b>Worker to complete:</b>
Signature: _____ Name: _____ Date: _____
<b>Manager and Assistant Secretary to complete:</b>
Based on the information available, including my own enquiries, I conclude: <i>(Indicate decision)</i>
NO CONFLICT                      REAL/APPARENT
Manager Signature: _____ Name: _____ Date: _____
Assistant Secretary: _____ Name: _____ Date: _____
<b><i>The following action is required to manage real or apparent conflict of interest: (Outline action required and reasons for the decision)</i></b>



## Attachment C – Declaration of consent by immediate family member to the disclosure of their personal, financial, and other interests

### FOR OFFICIAL USE ONLY – Sensitive: Personal

This declaration is to be completed by the immediate family member/s of the worker should circumstances arise where the personal financial and other interests of the family member/s could or could be seen to influence the decisions they are taking or the advice they are giving.

On completion, this declaration must be forwarded to [People Branch](#) for assessment and to be placed on your personnel file. Please retain a copy for your own records.

- I am aware that my information has been collected for the purpose of identifying personal and other interests that could or could be seen to influence the decisions that the worker is taking or advice the worker is giving.
- I am aware of the Privacy Principles set out in the *Privacy Act 1988* which authorise the collection and the third parties to whom my personal information may be disclosed.
- I consent to the collection of my personal information by the department.***

The below list of my private interests and relationships has been prepared on that basis.

Please list any private interests or relationships which could or could be seen to influence the decisions that the worker is taking or the advice he/she is giving.

The types of interests and relationships that may need to be disclosed include real estate investments, shareholdings, trusts or nominee companies, company directorships or partnerships, other significant sources of income, significant liabilities, gifts, private business, employment, social or personal relationships that could or could be seen to impact upon your responsibilities (refer to the [Self-Assessment Checklist – Attachment A](#)).

***Immediate family member of worker to complete:***




Signature: _____ Name: _____ Date: _____	
<b>Name of Worker:</b>	<b>Relationship to Worker:</b>
<b>Position Title:</b>	
<b>Branch/Group:</b>	
<b>Geographic Location:</b>	
<b><i>Manager and Assistant Secretary to complete:</i></b>	
Based on the information available, including my own enquiries, I conclude: <i>(Indicate decision)</i>	
NO CONFLICT	REAL/APPARENT
Manager Signature: _____	Name: _____ Date: _____
Assistant Secretary: _____	Name: _____ Date: _____
<b><i>The following action is required to manage real or apparent conflict of interest: (Outline action required and reasons for the decision)</i></b>	



## Attachment D – Contractor or Consultant Declaration of Personal Interests Form

### FOR OFFICIAL USE ONLY – Sensitive: Personal

This declaration of financial and other personal interests is to be completed prior to commencement with the department and whenever circumstance change, by contractors or consultants who have identified private interests, both financial and personal, that could present a real or apparent conflict with their official duties.

On completion, this declaration must be forwarded to the contract manager and a copy will be placed in the relevant HPE Content Manager file. Please retain a copy for your own records.

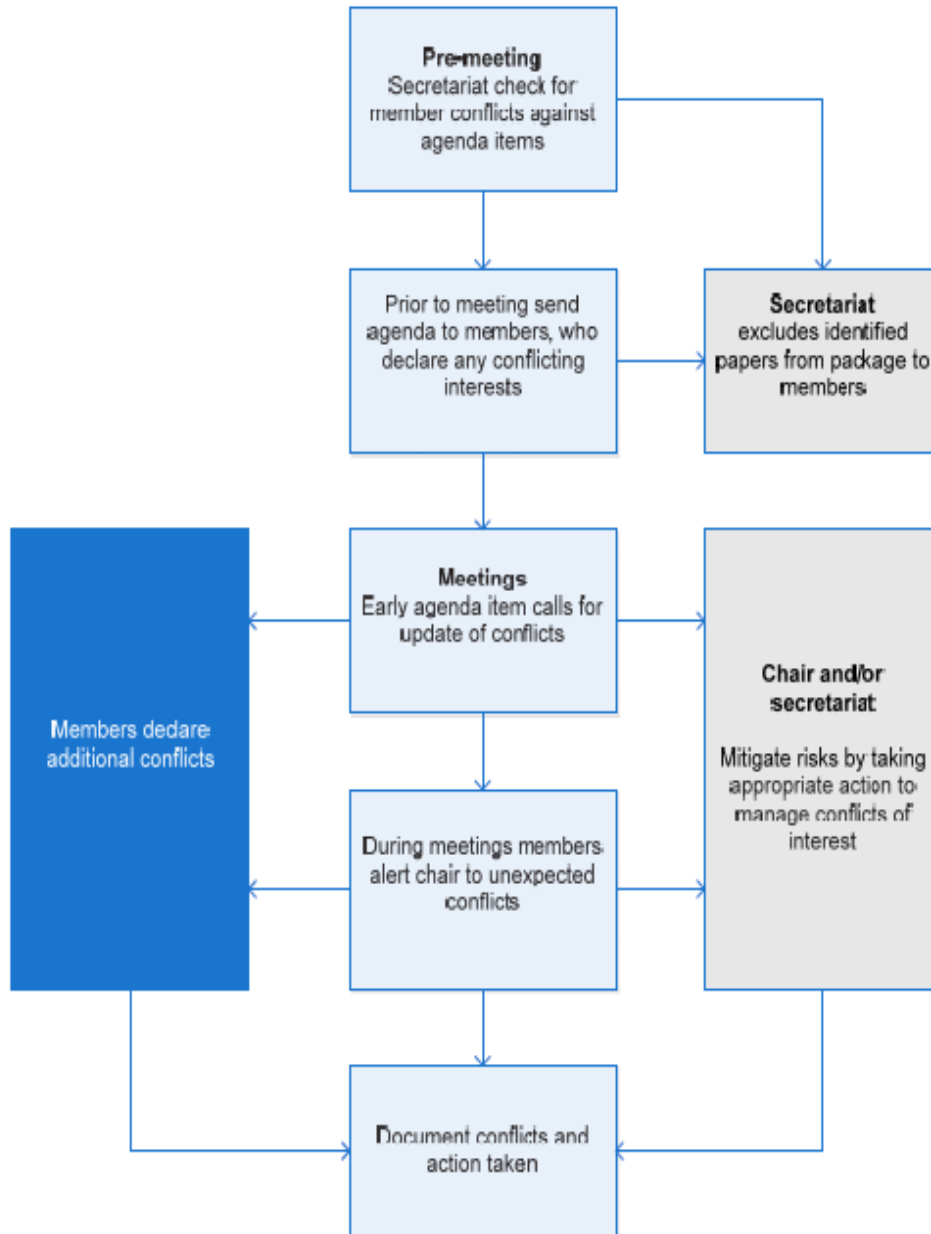
Name:
Position Title:
Branch/Group:
State:
I declare that:  <input type="checkbox"/> I am aware of my responsibilities under the department’s Conflict of Interest Policy and take reasonable steps to avoid any conflict of interest (real or apparent) in connection with my work in the department and not make improper use of (a) inside information, or (b) my duties, status, power, or authority, in order to gain, or seek to gain, a benefit or advantage for myself or for any other person.  <input type="checkbox"/> I was provided and have read and understood the Department of Education Conflict of Interest Policy.  <ul style="list-style-type: none"><li>• The below list of my private interests and relationships has been prepared on the basis of:<ul style="list-style-type: none"><li>– the particular roles and responsibilities of the department</li><li>– my particular roles and responsibilities within the department</li></ul></li></ul> <input type="checkbox"/> I undertake to immediately inform the department of any changes to:  <ul style="list-style-type: none"><li>• my responsibilities or to the issue or subjects on which I am required to make decisions or give advice.</li><li>• my personal circumstances that could affect the contents of this declaration and to provide an amended declaration/s using this pro forma.</li></ul> <input type="checkbox"/> I undertake to declare any private interests or relationships of my immediate family and close acquaintances that I am aware of, <u>should</u> circumstances arise in which could or could be seen to influence the decisions I am making or the advice I am giving. I understand this would require the consent of the family member or close acquaintance.

Please list any private interests or relationships that could or could be seen to influence the decisions you are making or the advice you are giving.

The types of interests and relationships that may need to be disclosed include real estate investments, shareholdings, trusts or nominee companies, company directorships or partnerships, other significant sources of income, significant liabilities, gifts, private business, employment, social or personal relationships that could or could be seen to impact upon your responsibilities (refer to the [Self-Assessment Checklist – Attachment A](#)).

<b>Contractor or consultant to complete:</b>
Signature: _____ Name: _____ Date: _____
<b>Manager and Assistant Secretary to complete:</b>
Based on the information available, including my own enquiries, I conclude: <i>(Indicate decision)</i>
NO CONFLICT <span style="margin-left: 150px;">REAL/APPARENT</span>
Manager Signature: _____ Name: _____ Date: _____
Assistant Secretary: _____ Name: _____ Date: _____
<b><i>The following action is required to manage real or apparent conflict of interest: (Outline action required and reasons for the decision)</i></b>

## Attachment E – Committee proceedings and conflict of interest



## Document details

---

Policy Owner	People Branch
Document Status	Final
Point of Contact	Director, Health and Performance Team People Branch, People, Parliamentary, Communications Division
Approver	Gemma Smith
Approval Authority	Assistant Secretary, People Branch  Department of Education
Date of Approval	1 July 2022

---

## Document Review and Change

Version	Date	Author/s	Summary of changes	Date of next scheduled review
1.0	1 July 2022	Health and Performance Team	Initial Document	1 July 2023
2.0	28 March 2023	Health and Performance Team	Updated branding	1 July 2023