

CONFLICT OF INTEREST POLICY AND PROCEDURE

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1.0 Purpose

This policy outlines the Engineering Institute of Technology's approach to identifying, disclosing, managing, and recording actual, perceived, and potential conflicts of interest to ensure compliance with the relevant legislation. (see [Related Legislation](#)).

2.0 Scope

This policy extends to EIT staff and stakeholders.

3.0 Objective

EIT is committed to maintaining integrity and transparency in all operations. All individuals covered by this policy must avoid situations where personal interests conflict, or appear to conflict, with professional responsibilities, and must actively disclose such situations.

4.0 Responsibilities

4.1 All Staff

- Must disclose conflicts of interest immediately upon identification.
- Must act in the best interests of the organisation and its students at all times.

4.2 Managers and Executives

- Must review disclosures and implement management plans where necessary.
- Must ensure that all decisions made in the presence of a conflict are documented.

4.3 Academic and Governance Boards

- Must maintain oversight of conflict of interest matters within their remit.
- Must ensure decision-making processes remain free from undue influence.
- Must declare any actual, potential, or perceived conflicts of interest at the commencement of each Board meeting
- Ensure that such declarations are appropriately recorded.

5.0 Procedure

5.1 Identification

Conflicts of interest can arise in contexts such as, but not limited to:

- Staff involvement in student assessment
- Procurement and contracting decisions
- Dual roles within governance or management
- Close personal relationships that may affect professional judgement
- External employment, consultancy, or business interests

5.2 Disclosure

Staff must complete a Conflict of Interest Disclosure Form and submit it to the Human Resource Manager. Declarations must be updated when circumstances change.

Board members must verbally declare conflicts of interest at the start of each meeting.

5.3 Management

The CEO or appointed representative (for staff), or the Board Chair (for Board Members), will assess each disclosure and determine a course of action, which may include:

- Recusal from discussions or decisions
- Transfer of responsibilities
- Increased oversight or review
- Other actions deemed appropriate to protect the integrity of EIT's operations

5.4 Recording

All disclosures and related actions will be recorded in a Conflict of Interest Register. These records will be securely maintained and reviewed annually.

5.5 Breach of Policy

Failure to disclose a conflict of interest or comply with a management plan may result in disciplinary action, up to and including termination.

6.0 Definitions

Please refer to the EIT Glossary, which can be found [here](#), for all definitions used in this document.

7.0 Related Documents

- Academic Board Terms of Reference.DS
- Board of Studies Terms of Reference.HE
- Conflict of Interest Disclosure Form
- Course Advisory Committee Terms of Reference.HE
- Diversity, Fair Treatment and Equal Opportunity Policy.DS
- Ethics Statement.DS
- Freedom of Speech and Academic Freedom Policy.DS
- Governance Board Terms of Reference. DS
- Learning and Teaching Committee Terms of Reference.DS
- Organisational Chart - Reporting Relationships.DS
- Organisational Structure - Personnel.DS
- Privacy Policy.DS
- Remuneration and Board Appointment Policy and Procedure.DS
- Research Committee Terms of Reference.HE
- Risk Management Policy.DS
- Risk Management Register.DS
- Staff Code of Conduct.DS

8.0 Related Legislation

The following legislation is relevant to this policy, however, not all are mandatory for education providers:

- [Corporations Act 2001 \(Cth\)](#)
- [Criminal Code Act 1995 \(Cth\)](#)
- [Fair Work Act 2009 \(Cth\)](#)

- [Higher Education Standards Framework \(Threshold Standards\) 2021 \(Cth\)](#)
- [National Vocational Education and Training Regulator Act 2011 \(Cth\)](#)
- [National Vocational Education and Training Regulator \(Outcome Standards for Registered Training Organisations\) Instrument 2025](#)
- [National Vocational Education and Training Regulator \(Compliance Standards for Registered Training Organisations and Fit and Proper Person Requirements\) Instrument 2025](#)
- [Privacy Act 1988 \(Cth\)](#)
- [Public Governance, Performance and Accountability Act 2013 \(Cth\)](#)
- [Tertiary Education Quality and Standards Agency Act 2011 \(Cth\)](#)

9.0 Accountabilities

The Governance Board is responsible for the review and approval of this policy.

The policy is to be implemented via the induction and training of staff and distribution to staff and EIT's community via the website and other publications.