



# Disclosure of External Interest Policy and Procedure

## ***Purpose***

1. The Australian International Institute of Higher Education ('the Institute') is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflict of interest.
2. This policy provides a framework for:
  - a) the Institute's community in declaring conflicts of interest
  - b) the Institute and the Governing Council, when determining how to deal with situations of conflict (potential, actual or perceived) involving staff and members of governing bodies, respectively.

## ***Scope***

3. This Policy applies to the Institute's community.

## ***Definitions***

4. ***Institute's community*** comprise the Institute staff and members of the Institute's governing bodies.
5. ***Conflict of interest*** may occur if an interest or activity influences or appears to influence the ability of a member of the Institute's community to exercise objectivity.

## ***Policy***

### **Statement**

6. The Institute places great importance on making clear any existing, potential or perceived conflicts of interest. All such interest shall be disclosed by each member of the Institute's community and documented in a Register of Interests.
7. If a member of the Institute's community believes another staff or governing body member has an undisclosed conflict of interest, the basis of this potential or perceived conflict should be specified in writing.
8. Where a member of the Institute's staff has a conflict of interest, that person shall not initiate or take part in any discussion on that topic.
9. Where a governing body member has a conflict of interest, as defined in this policy:
  - a) that person shall not initiate or take part in any discussion on that topic, either in a meeting or with other relevant members before or after the meeting, unless expressly invited to do so by unanimous agreement by all other members present
  - b) that member shall not vote on that matter.



10. The Governing Council may supplement the statutory definition of conflict of interest if it so wishes, in which case the same procedures shall apply.
11. A member of the Institute's community is not barred from engaging in business dealings with any organisation, provided that these are negotiated at arm's length without the participation of the person concerned.

## ***Roles***

12. The Chair is responsible for bringing this policy to the attention of prospective Members.
13. All members of the Institute's community are responsible for respecting this policy.

## ***Procedures***

### **Members of governing bodies (including the Governing Council)**

14. Before a Member begins his or her service, he or she shall file with the Chair of the relevant governing body a list of his or her principal business activities, as well as involvement with other charitable and business organisations, vendors or business interests, or with any other associations that might produce a conflict of interest. This information should be documented. A sample for documenting this interest is provided in Appendix A.
15. Members of all governing bodies shall disclose any conflicts (potential or actual) of interest of which they become aware either at the start of the meeting concerned or when a relevant issue arises. The nature of this conflict of interest should be entered into the meeting minutes.
16. Where a potential or conflict of interest, as defined below, is identified and/or registered, the member concerned shall leave the room as soon as that item comes up for discussion.

### **Staff members**

17. Upon commencing employment with the Institute, a staff member must disclose any potential conflict of interest and submit it to the immediate supervisor. A sample for documenting this interest is provided in Appendix A.
18. If a staff member discloses any conflict of interest, the supervisor shall discuss with the staff member how this conflict will be managed and inform the CEO.

## ***Review***

19. This Policy will be reviewed every two years after the date it becomes effective, in accordance with the Policy Development Policy and Procedure.



## Associated Information

<b>Approving body</b>	Governing Council
<b>Date approved</b>	23 October 2020
<b>Date of effect</b>	Commencement of operation
<b>Scheduled review</b>	Two years from when policy commence
<b>Current version approval date</b>	10/09/2024
<b>Next review date</b>	10/09/2026
<b>Policy owner</b>	Governing Council
<b>Policy contact</b>	Governing Council
<b>Related AIIHE Documents</b>	AIIHE Governance Framework Policy Development Policy and Procedure Declaration of Interest Register
<b>Higher Education Standards Framework (Threshold Standards) 2021 (Cth)</b>	Standard 6.1, ss 1, 3 Standard 6.2, ss 1
<b>Other related external instruments/documents</b>	<b>Related Legislation</b> <ul style="list-style-type: none"><li>Tertiary Education Quality and Standards Agency Act 2011 (Cth)</li></ul>

## Document history

Version	Author	Changes	Approval Date
1.0	Not applicable	Original version	23 October 2020
1.1	Compliance Officer	Reviewed to align with the HESF 2021 and the footer was updated with current addresses.	10 September 2024

*N.B. The document is uncontrolled when printed! The current version of this document is maintained on the AIIHE website at [www.aiihe.edu.au](http://www.aiihe.edu.au).*



## Appendix A

### Disclosure of Interest Form

The Institute requires all staff members and members of its governing bodies to disclose significant relationships and associations that may create conflicts of interest.

A conflict of interest, or a perception of a conflict, can arise whenever a transaction, an action or a relationship with the Institute conflicts with the personal or other interests, financial or otherwise, of that of a Council member, or an immediate family member of a Council member, or that of the Council member's employer (collectively "your personal interests").

Please indicate below any relationships, transactions, or positions you hold (volunteer or otherwise), or circumstances that you believe could create a conflict of interest, financial or otherwise:

I have the following Interests to disclose:

For example, *shares in x company, membership of x organisation, business/personal relationship with x*

Entity or Individual	Involvement, % ownership, consulting or contractual relationship, family or social ties, etc.	Proposed method for handling the conflict (disclosure, refraining from voting, recision of papers referring to issues, etc.)

I understand that it is my obligation to disclose a conflict of interest, current or potential, or a perception of a conflict, to the Chair of the Governing Council when a conflict, or perception of a conflict, arises and that for transactions in which I have a conflict I will manage the conflict in the manner determined by the Council and recorded above. I have read, understood, and abide by the Conflicts of Interest policy.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_