



## Conflict of Interest (Revision 3)

**Target audience:** All people who undertake paid or unpaid work within, or on behalf of the Great Barrier Reef Marine Park Authority ('the Authority')

### Purpose

1. To provide guidance on circumstances in which to declare a [conflict of interest](#) (real, apparent, or potential) for Authority workers between their Australian Public Service (APS) duties and private interests, in order to maintain the Authority's integrity, promote transparency in decision-making and minimise the risk of fraudulent activity.

### Context/ scope

2. Public confidence in the integrity of the Authority is vital to its proper operation and contributes to the achievement of strategic objectives. Whilst it is not always possible to avoid having conflicts of interest, the transparent disclosure, documentation and robust management of conflicts reduces the risk of reputational harm, and supports the validity and objectivity of decisions made.
3. For the purposes of this policy, in addition to the definitions section, any reference to:
  - 3.1. "conflict of interest" is taken to include potential conflicts of interest – real or apparent
  - 3.2. "manager" is taken to mean a supervisor
  - 3.3. "immediate family member" may have different meanings, depending on individual circumstances.
4. Whilst provisions within standard contracts and the Commonwealth Grants Guidelines require a declaration of conflict(s) of interest, the scope of this policy also extends to workers engaged via these methods (such as contractors, subcontractors, consultants and grant recipients), as circumstances give rise to a relevant need.

### Definitions

- *Benefit(s)* may be tangible or intangible in nature, including the provision of access to, or disclosure of, information. A benefit may also be obtained by a third party<sup>1</sup>.
- *Conflicts of interest* means a conflict between the public duties and personal interests of an official, where the official has private-capacity interests which could improperly influence the performance of their official duties and responsibilities<sup>2</sup>.

Conflicts of interest may be:

- real – where a direct conflict exists between current official duties and private interests that improperly influences the performance of duties<sup>3</sup> and responsibilities;
- apparent – where it appears or could be perceived that private interests are improperly influencing the performance of official duties (whether or not that is, in fact, the case)<sup>3</sup>; or
- potential – where private interests are not, but could, come into direct conflict with official duties<sup>4</sup>.
- *Fraud* has the same meaning as defined by the Authority's Fraud Control Policy and Plan (document number 100174 on the [master document list](#)).
- *Material personal interest* is one that can give rise to a real or apparent conflict of interest that could affect the ability of an official to discharge their duties<sup>5</sup>.

**Note:** Personal interests do not automatically give rise to a conflict unless there is a real or sensible possibility of conflict. If a reasonable person could draw a connection between a worker's personal interest and their duties, then the personal interest is 'material'.

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Whilst there is no standard list of personal interests that must be disclosed, these can be categorised generally into financial and personal types. Financial types of interest that should be considered include, but are not limited to, real estate investments, shareholdings, trusts or nominee companies, company directorships, involvement in self-managed superannuation funds, other significant sources of income and significant liabilities.

Personal conflicts may include, but are not limited to, receipt of gifts, private business interests, other employment, voluntary activities, criminal associations, political or ideological associations and social or personal relationships that could, or could be seen to, impact on public duty actions or decisions<sup>3</sup>.

- *Official* has the same meaning as provided in section 13 of the *Public Governance, Performance and Accountability Act 2013*. For the purposes of this policy, where the term 'official' is used (including within other defined terms), it should be taken to have the same meaning as 'worker', as defined within this policy.
- *Worker* for the purposes of this policy, has a meaning adopted from the *Work Health and Safety Act 2011* and is taken to mean a person who carries out work in any capacity for the Authority. 'Workers' may be employees engaged under the Public Service Act, officials, contractors or subcontractors, an employee of a contractor or subcontractor, an employee of a labour hire company who has been assigned to work in the Authority, an outworker, an apprentice or trainee, a work experience student, a volunteer, or a person of a prescribed class.

### Related documents/ legislation

- *Public Service Act 1999* (section 13, the Australian Public Service Code of Conduct)
- *Public Governance, Performance and Accountability Act 2013*
- Commonwealth Fraud Control Framework
- Australian Public Service Values and Code of Conduct in Practice
- Department of Finance's Resource Management Guidelines No. 203 – General duties of officials
- Internal policy, Fraud Control Policy and Plan (document number 100174)
- Internal procedure, Public Interest Disclosure (document number 100098)
- Internal form, Conflict of Interest – Declaration (document number 100146)

### Policy statements

#### General principles and requirements

5. All workers must actively identify situations that could be interpreted as a [conflict of interest](#), whether real, apparent or potential, and take immediate steps to avoid such situations in the best interests of the Authority. For this reason, compliance with Commonwealth and Authority policies/ procedures must be observed.
6. Authority workers have access to information that could potentially be used for personal gain. Any information acquired (either directly or indirectly) as part of Authority duties must not be used for personal gain.
7. Section 13(7) of the APS Code of Conduct (contained in the *Public Service Act 1999*), and section 29 of the *Public Governance Performance and Accountability Act 2013* require, among other things, that an employee/ official:
  - 7.1. must take reasonable steps to avoid any conflict of interest (real or apparent) in connection with APS employment, and
  - 7.2. must disclose details of any [material personal interest](#) in connection with their APS employment, and
  - 7.3. must not make improper use of inside information, duties, status, power and/ or authority in order to gain (or seek to gain) a benefit or advantage for themselves or any other person.

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8. All offers of employment made by the Authority are to be conditional upon a declaration of any personal interests being made which may cause (or be perceived to cause) a conflict of interest with their duties as an Authority worker. A copy of this policy is to be included with all letters of offer, including for unpaid work. Arrangements to engage someone as a worker should not be finalised until the prospective worker completes the necessary declaration.
9. Offers of employment should not be made where this is likely to create an unmanageable conflict of interest situation in the workplace (e.g., where a new worker is an immediate family member, or in a personal relationship with a supervisor or colleague in the same work unit).
10. Should a new employment arrangement (including those that have come about due to organisational/ structural changes) give rise to a conflict of interest situation (real, apparent or potential), the arrangement must not be finalised until documentation of how the conflict of interest will be managed is approved by an appropriate delegate. See the '[accountabilities and responsibilities](#)' section of this policy for more information on delegate responsibilities.
11. It is highly desirable that workers not have material interests in industries with which the Authority routinely engages, and workers are encouraged to divest themselves of such interests. If workers choose not to divest themselves of these interests, they must declare the conflict the situation with their manager, branch General Manager or the Chief Executive Officer.

**Identifying and disclosing conflicts of interest**

12. The Chief Executive Officer and Senior Executive Services (SES) workers, including those acting in SES roles for longer than three months, are required to declare in writing, at least annually, their own and immediate family's financial and other interests that could cause a real or apparent conflict of interest. Statutory office holders generally declare their interests to the Minister and in accordance with any requirements specified by legislation in relation to their office.<sup>3</sup>
13. All those engaged under the *Public Service Act 1999* are required to declare in writing to their supervisor, at least annually, any personal interests that could cause a real or apparent conflict of interest. This annual declaration should be made and housed within the Authority's human resources management information system (known as 'Aurion'), to enable supervisor and delegate oversight. Any other person undertaking work on behalf of the Authority (e.g., labour hire workers, volunteers, suppliers/ consultants) should declare, in writing (before commencement of work in the Authority), any personal interests that could cause a real, apparent or potential conflict of interest in connection with Great Barrier Reef Marine Park Authority decisions, advice or work. If this declaration cannot be housed within the Authority's human resources management information system, it should be stored in the relevant Legal 'document set' on the Authority's electronic document records management system (known as 'TheDock').
14. Conflict of interest declarations should be regularly updated, (i.e., within the annual cycle, or more frequently than on commencement of work), by all workers when circumstances change – such as, movement to a different role, or changed personal circumstances.
15. Annual declarations must be provided via the employee's supervisor to the branch General Manager for approval. A copy of the approved declarations must be provided to People Services for registering on the Authority database. Any interim updates of these declarations must be provided to People Services.
16. Certain functions and duties may require workers to declare conflicts of interest to an appropriate delegate more frequently and/ or specifically, or when certain events involve a heightened risk of conflict of interest, as shown in Table 1 below.
17. Where any personal interests or relationships may improperly influence, or be seen to improperly influence workers in their public duties, a conflict of interest must be declared, appropriately recorded and the matter referred to the appropriate decision-maker so the conflict can be resolved, in most cases by removing the conflicted person from the decision making process.

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Table 1: Activities with heightened risk of conflicts of interest<sup>3</sup>

Function	Activity
Procurement	(a) Procuring goods or services (b) Tendering for and managing contracts
Regulating individual or business activities	(c) Inspecting, regulating or monitoring standards, processes, businesses, equipment or premises (d) Issuing qualifications/ permits or licences (e) Issuing or reviewing the issue of, administrative actions, fines or penalties
Distributing goods, services or funds	(f) Providing a service (g) Allocating grants or public funds, or disposing of public assets (h) Allocated subsidies, financial assistance, concessions or other relief
Making binding decisions or providing assurances	(i) Issuing determinations on matters (j) Passing binding judgements (k) Exercising statutory powers (l) Voting, or providing assurances as a member of a board or committee.
Recruitment selection panels and staff management	(m) Participating as a member or chair of a selection panel (n) Engaging and promoting employees (or other types of workers) (o) Making appointments to statutory positions (p) Determining and/or managing the performance of workers (q) Approving salary increments or deviations.

**Note:** The support tool at [Appendix 1<sup>6</sup>](#) may be used to assist in the identification of real, apparent or potential conflicts of interest.

18. When any conflict of interest (real, apparent or potential) is declared, enough information must be provided to enable a delegate/ decision-maker to make an informed decision about whether a conflict exists, and if so, how it should be managed.
19. Failure to declare conflicts of interest may constitute a breach of Code of Conduct, misconduct or fraud. Where there is credible evidence that a personal interests has compromised a decision or influenced the partiality of exercising a public duty, the situation should be handled as suspected fraud or misconduct<sup>3</sup>. Refer to the '[APS Code of Conduct – Determining Breaches and Sanction](#)' procedure (document number 100073) for further information.

### Interests of immediate family

20. Where a personal interest of an immediate family member influences, or could be seen to influence, the decisions a worker is making or advice they are giving, these interests must be disclosed. Disclosure may be documented within Part 'B' of the internal form 'Conflict of Interest - Declaration' (document number 100146 within the [master document list](#)). Where a family member is not able to complete Part B, the worker's understanding of the conflict of interest should be discussed, in general terms, with the appropriate delegate who will make a determination about how the conflict should be resolved.
21. In a recruitment process, where:
  - 21.1. an immediate family member or a person in a personal relationship with a worker is an applicant for a position, the worker must remove themselves from the process
  - 21.2. members of a selection panel are immediate family members or in a personal relationship with an applicant one of the conflicted individuals must remove themselves from the selection process.

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### Managing conflicts of interest

22. In determining whether a conflict of interest exists and is material the following factors should be considered:
- 22.1. The type/ size of the personal interest, real, apparent or potential
  - 22.2. The nature/ significance of the decision or activity being carried out and the extent to which a worker's personal interests could affect or be affected by the decision or activity
  - 22.3. The nature/ extent of the worker's involvement, control or influence over the decision or activity.

23. Where a declaration discloses a conflict of interest, the parties involved must take steps to resolve it, in a risk-informed way. Remedial options available include, but are not limited to, withdrawing from discussions/ involvement, restricting the flow of information, abstaining from decisions, removal from the decision-making situation, reassignment of duties, or relinquishing the interest or the position.

**Note:** The support tool at [Appendix 1](#) may be used to assist in determining appropriate strategies to manage conflicts of interest.

24. Without exception, management of conflicts must always be in favour of the public interest rather than private interests. Where an agreement cannot be reached, the matter may be referred to the General Manager in the first instance for determination of measures required to resolve the conflict. Previous efforts made to resolve the conflict (and why these have not been successful) should be taken into account.
25. Following supervisor endorsement, Declaration of Interest forms must be forwarded to the relevant Branch General Manager for final approval
26. Whilst the management of conflicts of interest should be a transparent process<sup>3</sup>, personal information must be managed in accordance with the *Privacy Act 1988*, and all relevant documentation regarding conflict of interest declarations and management should be securely maintained and retained in accordance with the *Archives Act 1983*.

### Monitoring conflicts of interest

27. Annual declarations should be revised, approved and resubmitted to People Services whenever a change in personal circumstances and/or a change in work responsibilities could involve a new real or apparent conflict of interest.
28. Additional declarations should be made at the commencement of any formal governance meeting, procurement or selection panel process and should be recorded as part of the relevant process documentation and be retained by the relevant secretariat/Chair.
29. Where any doubt regarding a conflict of interest exists, further information and advice should be sought from the Fraud Control Officer.

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**Accountabilities and responsibilities**

30. All Authority workers must comply with their accountabilities and/or responsibilities as outlined within Table 2 below, noting that some people may have more than one set of obligations

Table 2: Accountabilities and responsibilities of various workers under this policy

Who	Accountability/ responsibility
All workers	<ol style="list-style-type: none"> <li>1. Responsible for being aware of, and complying with their obligation to avoid material personal interests, and where they cannot be avoided, formally disclosing these – whether real, apparent, or potential – to the relevant delegate/ decision-maker and/or the Chief Executive Officer, as appropriate, so they can be managed.</li> <li>2. Responsible for participating in any training and complying with this policy and any other policies, procedures or strategies implemented for the management of conflicts of interest.</li> <li>3. Responsible for reporting suspected breaches of this policy to either the People Services section, or the Authority’s Fraud Liaison Officer for investigation.</li> </ol>
All workers supervising others	<ol style="list-style-type: none"> <li>4. Responsible for modelling the ethical tone within the Authority and being aware of potential conflicts inherent in the public duties of the workers they manage.</li> <li>5. Responsible for promoting conflict of interest awareness amongst the workers they manage, and assisting those who disclose conflicts of interest to prepare management strategies.</li> </ol>
People Services	<ol style="list-style-type: none"> <li>6. Responsible for establishing a system for identifying, managing and recording annual conflict of interest declarations.</li> <li>7. Responsible for providing support to managers and workers in the implementation of this policy, and for regularly reviewing the effectiveness of strategies to improve worker awareness of their obligations to disclose and manage conflicts of interest.</li> <li>8. Responsible for providing advice and guidance to those seeking clarity on what might constitute a conflict of interest, or the manner in which conflicts of interest could be managed.</li> <li>9. Responsible for receiving grievances regarding suspected breaches of this policy, and where required, for liaising with the Authority’s Fraud Liaison Officer to facilitate investigation.</li> </ol>
All delegates, decision-makers, Executive Level and Senior Executive Services-level workers	<ol style="list-style-type: none"> <li>10. Responsible for modelling an observably high level of commitment within the Authority to conflict of interest identification, management and monitoring.</li> <li>11. Responsible for assuring that documented conflict of interest considerations (in accordance with this policy) are formally integrated into all processes and frameworks for which they are responsible – particularly those involving <a href="#">Activities with heightened risk of conflicts of interest</a><sup>3</sup>.</li> <li>12. Responsible for reviewing conflict of interest declarations, and approving and enforcing remedies to manage conflicts declared.</li> <li>13. Responsible for setting the ethical tone within the Authority and taking all reasonable measures to avoid or manage conflicts of interest.</li> </ol>
Chief Executive Officer	<ol style="list-style-type: none"> <li>14. Accountable for setting the ethical tone within the Authority and taking all reasonable measures to avoid or manage conflicts of interest.</li> <li>15. Accountable for establishing systematic governance arrangements for conflict of interest identification and management.</li> </ol>

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**Appendix 1 – Conflict of interest identification and management support tool**

To purpose of this support tool is to assist in the identification of real, apparent or potential conflicts of interest.

Consider the function/ activity you are involved in, and your public duty in relation to it, then answer the following questions. If you select 'yes' to any question, you may have a conflict and should discuss your situation with your supervisor/ panel or committee chair/ delegate or the decision maker (as applicable).

	Yes	No
• Would I, or anyone associated with me benefit or be detrimentally affected by my decision/ action?	<input type="checkbox"/>	<input type="checkbox"/>
• Could there be benefits for me now or into the future that could cast doubt on my objectivity?	<input type="checkbox"/>	<input type="checkbox"/>
• Do/ did I have a personal, professional or financial relationship/ association of any significance with an interested party? Do they stand to lose or gain by my decision/ action?	<input type="checkbox"/>	<input type="checkbox"/>
• Would my reputation, or that of a relative, friend or associate stand to be enhanced or damaged because of the decision/ action?	<input type="checkbox"/>	<input type="checkbox"/>
• Do I hold any personal or professional biases that my lead others to reasonably conclude that I am not an appropriate person to deal with the matter?	<input type="checkbox"/>	<input type="checkbox"/>
• Have I contributed in a private capacity in any way to the matter being dealt with?	<input type="checkbox"/>	<input type="checkbox"/>
• Have I received a benefit, gift or hospitality from someone who stands to gain or lose from my decision/ action?	<input type="checkbox"/>	<input type="checkbox"/>
• Have I made any promises or commitments in relation to the matter?	<input type="checkbox"/>	<input type="checkbox"/>
• Could this situation have an influence on any future employment opportunities outside my current official duties?	<input type="checkbox"/>	<input type="checkbox"/>
• Is the decision/ action one of great public interest or controversy (that could attract greater scrutiny)?	<input type="checkbox"/>	<input type="checkbox"/>
• Would a fair-minded member of the public have concerns regarding these circumstances?	<input type="checkbox"/>	<input type="checkbox"/>
• Could my involvement in this matter cast doubt on my integrity or on that of the Authority?	<input type="checkbox"/>	<input type="checkbox"/>
• If I saw someone else doing this, would I suspect that they might have a conflict of interest?	<input type="checkbox"/>	<input type="checkbox"/>
• Would I be happy if my colleagues, the public or the media became aware of my involvement and associated connections?	<input type="checkbox"/>	<input type="checkbox"/>
• Do I still have any doubts about my proposed decision/ action?	<input type="checkbox"/>	<input type="checkbox"/>

If a conflict does exist, **Figure 1** below provides options for managing such situations.

<b>Record</b> Document disclosure formally	<b>Restrict</b> Limit involvement in the matter	<b>Recruit</b> Involve impartial third party to oversee the matter	<b>Remove</b> Exclude involvement in the matter	<b>Relinquish</b> Surrender the personal interest	<b>Resign</b> Abdicate position/ involvement with the Authority
<b>When to use:</b> <ul style="list-style-type: none"> <li>For very low risk and potential conflicts</li> <li>When transparency by recording the conflict is sufficient</li> </ul> <b>Note:</b> Additional measures should be considered	<b>When to use:</b> <ul style="list-style-type: none"> <li>When separation from parts of the activity or process can be effective</li> <li>When the conflict is not likely to arise frequently</li> </ul>	<b>When to use:</b> <ul style="list-style-type: none"> <li>When potential/ perceived effects of the conflict are significant</li> <li>When removal is not desirable (e.g., expertise is genuinely not easily replaced)</li> </ul>	<b>When to use:</b> <ul style="list-style-type: none"> <li>For ongoing, serious conflicts where ad hoc restriction or recruitment is not feasible or appropriate</li> </ul>	<b>When to use:</b> <ul style="list-style-type: none"> <li>When relinquishing personal interests is preferred over radical changes to work responsibility or environment</li> </ul>	<b>When to use:</b> <ul style="list-style-type: none"> <li>When the conflict cannot be resolved workably or is not effective, and effects/ perceived effects of the conflict are high risk or significant.</li> <li>By choice</li> </ul>
<b>Strategies:</b> <ul style="list-style-type: none"> <li>Make your supervisor aware of the conflict</li> <li>Inform likely affected parties of the disclosure and the Authority's views about it (e.g., whether the conflict is real, apparent, potential; whether it's minimal; whether it's satisfactorily being managed)...</li> </ul>	<b>Strategies:</b> <ul style="list-style-type: none"> <li>Do not participate in any critical processes, votes, or decision points</li> <li>Refrain or withdraw from taking part in debate or discussion</li> <li>Restrict access to information relating to the matter.</li> </ul>	<b>Strategies:</b> <ul style="list-style-type: none"> <li>Arrange for the affected decision to be made by an independent third party</li> <li>Engage a probity advisor to review process integrity</li> <li>Increase decision-makers to balance the influence of the conflicted</li> <li>Seek views of those affected about objections to your involvement.</li> </ul>	<b>Strategies:</b> <ul style="list-style-type: none"> <li>Abstain from any involvement and formal/ informal discussions about the matter</li> <li>Remove yourself from situations where you may exert, or be perceived to exert influence</li> <li>Re-arrange duties and responsibilities</li> <li>Transfer to another area, project, organisation.</li> </ul>	<b>Strategies:</b> <ul style="list-style-type: none"> <li>Liquidate personal interests in arm's-length transaction</li> <li>Withdrawing support for your personal interest (unless it's essential for your position, e.g., membership of a professional body)</li> <li>Assigning your personal interest to a 'blind trust/ management' arrangement – while conflicted.</li> </ul>	<b>Strategies:</b> <ul style="list-style-type: none"> <li>Resign from your position/ role</li> <li>Request a transfer to another entity or jurisdiction</li> <li>Request early retirement from your position/ role if feasible and available.</li> </ul>

Figure 1: The '6 R's' options for managing conflicts of interest<sup>3</sup>

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**Conflict of Interest** (Revision 3)**References/ endnotes**

- 1 Attorney-General's Department, 2017, *Preventing, detecting and dealing with fraud. Recourse management guide No. 201*, Commonwealth of Australia, Canberra.
- 2 Organisation for Economic Co-operation and Development. 2003, *Managing Conflicts of Interest in the Public Service: OECD Guidelines and country experiences*, OECD, Paris.
- 3 Australian Public Service Commission, 2017, *APS Values and code of conduct in practice*, Commonwealth of Australia, Canberra
- 4 Office of the Commonwealth Ombudsman. 2017, *Conflict of interest guidelines*, Commonwealth of Australia, Canberra.
- 5 Department of Finance, 2016, *General duties of officials. Resource management guide No. 203*, Commonwealth of Australia, Canberra.
- 6 Independent Commission Against Corruption, Crime and Misconduct Commission, Queensland, 2004, *Managing conflicts of interest in the public sector toolkit*, NSW Government and QLD Government, Sydney and Brisbane.

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