

Conflict of Interest Management Considerations

| Management Option | Considerations |
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| Take No Further Action | <ul style="list-style-type: none"> - This management option would be acceptable where the risk is determined to be insignificant (in accordance with the University's Risk Management Framework). - Accurate and clear documentation should be maintained to indicate the reasons why taking no further action would be appropriate. - Where the risk assessment determines the risk to be greater than insignificant, great care should be taken if opting to take no further action. - For research, the interest should be registered with the Research Grants Office. |
| Changing the Person's Official Relevant Activities | <ul style="list-style-type: none"> - Consider reducing or amending the persons involvement, where removing the person from the matter entirely is impractical. This may involve: <ul style="list-style-type: none"> - limiting involvement to particular aspects; - segregating or reducing their duties; - reducing their seniority in the specific matter; - providing greater supervision; - excluding them from discussions / meetings / decisions; - placing them in an advisory role with no decision making authority; - excluding them from official record keeping roles; - preventing them dealing with external stakeholders; - changing their reporting lines; - limiting access to information / systems; - including a staff member of equal or greater seniority; - engaging an independent expert; - engaging a peer or subject matter expert to review the work of the conflicted person; - for research removing the conflicted researcher from participation in all or a portion of the research. - Consider reducing or amending the person's influence: <ul style="list-style-type: none"> - transferring the matter to another unit or team that is not connected with the conflicted person; - transferring the person to another project, division or unit (temporarily or permanently); - creating a physical separation between the conflicted person and decision-makers; - removing access to information and records; - informing other people about the conflict and instructing them on how to meet probity requirements. - For research this may also involve: <ul style="list-style-type: none"> - developing an approved conflict of interest management plan; - publicly disclosing the conflict of interest, for example: <ul style="list-style-type: none"> ▪ in presentations and publications; ▪ to collaborators; ▪ to study participants (for human research). |
| Changing the Person's Personal Interest | <ul style="list-style-type: none"> - Generally, a negotiation with the person will occur to come to an agreement regarding how the personal interest may be changed. Considerations for changing the personal interest may include the person: <ul style="list-style-type: none"> - disposing of a pecuniary interest; - resigning a directorship; - relinquishing ownership of an asset; - refraining from communicating with a particular person during the process (for non-pecuniary interests). |
| Changing the System or Process | <ul style="list-style-type: none"> - Generally where this management option is chosen the change should increase or strengthen controls and probity of the process, such as stronger record keeping, additional monitoring or assurance. Examples include: <ul style="list-style-type: none"> - requiring more detailed documentation about aspects of the matter; |

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| | <ul style="list-style-type: none">- re-designing the decision making or approval process to reduce subjectivity and discretion; - documenting reasons for decisions that are taken;- creating audio or video recordings of key decisions or meetings;- conduct a post-completion review;- maintaining audit and access logs;- enhancing controls to protect information from unauthorised access, use or disclosure;- establishing internal controls to identify deviations from the process;- appointing probity checkers, advisors or auditors;- providing additional training / awareness raising sessions. <p>- For research, this may also involve not proceeding with the research project. This decision should be approved by the DVCR&I.</p> |