Conflict of Interest Policy

Section 1 - Purpose

(1) This Policy outlines the requirements of Macquarie University and its Controlled Entities (the University) relating to the disclosure and management of conflicts of interest.

(2) The Policy specifies the principles and procedures for transparent identification and management of conflicts of interest, whilst maintaining a culture of honesty, integrity, and trustworthiness.

Scope

(3) This Policy applies to the following (referred to in this Policy as University representatives):

a. staff of the University , including continuing, fixed-term and casual staff members;
b. consultants and contractors working for the University;
c. members of the University governing bodies;
d. persons holding honorary titles with the University;
e. volunteers; and
f. individuals conducting research under the auspices of the University (including students) and bound by the Macquarie University Code for the Responsible Conduct of Research.

Background

(4) This Policy is consistent with the expectations of: the Independent Commission Against Corruption (ICAC); the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025; the principles of the Australian Code for the Responsible Conduct of Research, 2018; and, as related to funded research from the Australian Research Council, the Australian Research Council's ARC Conflict of Interest and Confidentiality Policy.

Section 2 - Policy

(5) A conflict of interest arises when an individual's Personal Interests (financial or non-financial) conflict, have the potential to conflict, or may be perceived by a reasonable person to conflict with the individual's Professional Obligations.

(6) Opportunities for conflicts of interest exist in all aspects of University operations including research, teaching, assessment, employment (including recruitment), administration, procurement, and other commercial activity. It is important that all members of the University community act, and are seen to act, with integrity and are not inappropriately benefited by improperly using their association with the University or acting in any way contrary to public interest.

(7) Conflicts of interest may arise from the nature of the activities undertaken by the University. The existence of a conflict of interest is not, of itself, improper or unethical and cannot always be avoided. Accordingly, the University requires that relevant Personal Interests and conflicts of interest are disclosed, documented and appropriately managed in accordance with this Policy.

(8) All University representatives are required to perform their duties with fairness, impartiality, integrity and honesty, and to adhere to University regulations, enterprise agreements, rules, standards, codes of conduct, policies and procedures.

(9) All University representatives must:

a. submit an annual Conflict of Interest declaration using the University's Disclosure and Management of Interests Form by the end of March each year, including a nil return where no interests exist (unless otherwise specified in clause 19);
b. promptly disclose any new or changed conflict of interest to their manager/supervisor or other relevant University official as it arises, and not wait until the next annual declaration;
c. not allow Personal Interests to affect the way Professional Obligations are carried out;
d. where a conflict of interest has been identified, work with their manager/supervisor or other relevant University official to develop, implement, and follow an appropriate Conflict of Interest Management Plan; and
e. record and maintain all declarations and management plans using the University's Disclosure and Management of Interests Form.

(10) In the context of undertaking research, University representatives must also disclose and manage conflicts of interest in accordance with applicable external requirements, including those imposed by regulatory frameworks, relevant Commonwealth guidelines, funding bodies, publishers and research ethics committees.

(11) To comply with the National Higher Education Code to Prevent and Respond to Gender-based Violence 2025 all Staff must declare:

a. any existing or previous intimate relationship with another Staff member where one party has, or is likely to have, supervisory oversight or other decision-making responsibilities in relation to the other;
b. any existing or previous intimate relationship with a current Student where they hold, or are likely to hold, actual or perceived authority over that Student; and
c. in the case of Staff working in or in connection with student accommodation facilities of the University, any existing or previous intimate relationship with any resident of one of the University's student accommodation facilities.

Where such a declaration is made, a Conflict of Interest Management Plan must be implemented. This may include permanent alternative teaching, research, or working arrangements as necessary to ensure transparency, fairness, and the integrity of academic and professional environments. This requirement applies to situations in which the Staff member has supervisory oversight, holds decision-making responsibilities, or is able to influence work allocation, performance evaluation, promotion, or access to opportunities for the other Staff member.

Identification and Disclosure

(12) University representatives must proactively identify and assess their Personal Interests. Conflicts of interest can arise due to an overlap, competition or connection between the University representative's Professional Obligations and their Personal Interests, which may have, or be perceived to have, an undue influence on the way they perform their Professional Obligations or may result in disadvantages to the University or other people.

(13) The interests, associations, or relationships (whether current, or where specified, past) in which conflicts of interests commonly arise include, but are not limited to:

a. outside employment, appointments, or roles, including consultancies, directorships, advisory group memberships in other organisations, and other professional positions (within the past 2 years);
b. companies, trusts, or other shareholding or ownership arrangements, including interests in University-affiliated commercial entities, such as start-ups, spin-out companies, or joint ventures;

c. support (financial or in kind), including receiving recompense in the form of cash, services, or equipment from other parties for research related or education activities, including but not limited to from a country other than Australia;
d. current or past associations or affiliations with a talent program from a country other than Australia (within the past 5 years);
e. current or past associations or affiliations with a government, intelligence organisation, government-owned enterprise, military and/or police organisation in a country other than Australia;
f. family, personal, or professional relationships; and
g. any other interest, association, or relationship that could reasonably be perceived as giving rise to a conflict of interest.

(14) A Personal Interest may also exist where an individual’s partner or immediate family member has any of the interests listed in clause 13. The term ’partner’ may refer to personal or business partners. The overriding principle for a declaration for a Personal Interest is, if in doubt, the individual should declare the interest in accordance with the appropriate process pertaining to their role. This is to ensure that the University can take account of varied individual circumstances to ensure conflicts of interest are managed appropriately and consistently. This also ensures that, should any issues or queries arise, the individual can demonstrate that they have taken appropriate action.

(15) Where there is uncertainty in the identification of a conflict of interest, the University representative must make a disclosure to their manager/supervisor or other relevant University official.

(16) In addition, there are specific requirements for disclosing Personal Interests (whether they do or do not constitute a conflict of interest) for:

a. key management personnel; and
b. for all University representatives in respect to countering foreign interference legislation.

(17) For guidance on examples of Personal Interests and conflicts of interest refer to Annexure A - Examples of Conflicts of Interest.

Methods for disclosing Personal Interests and conflicts of interest

(18) The primary obligation for disclosing a Personal Interest or a conflict of interest rests with the University representative who has the Personal Interest. This does not preclude the University from identifying where a conflict of interest may exist and requiring a Conflict of Interest Management Plan.

(19) Personal Interests and conflicts of interest must be disclosed promptly and transparently, and a written record of the disclosure must be recorded using the Disclosure and Management of Interests Form, unless an alternative disclosure and recording method is specified below. In some circumstances, disclosure through additional methods is also required.

Disclosing Personal Interests for key management personnel	Applies to: the members of the Executive Group; members of the University Council and Committees of Council; Chief Executive Officer of a Controlled Entity; and board members of the University’s controlled entities	Personal Interests must be disclosed to the relevant board secretary in accordance with the process for that board or group: on appointment; annually; or as they arise or change. Please refer to the Key Management Personnel (KMP) Reporting Procedure for further information.Members of the University Council and its Committees should also have regard to Schedule 2A, section 5 of the Macquarie University Act 1989 (NSW) which sets out the legal requirements for the disclosure of material interests by Council members.

Disclosing Personal Interests in respect to affiliations with foreign institutions or governments	Applies to: all University representatives	All University representatives must disclose affiliations with foreign institutions and organisations, and any foreign government links. This may include: engagement with or membership of foreign talent programs, any financial or in-kind support received from any foreign entity, shareholding and/or officer roles in companies, personal income, gifts, sponsorship, travel support or research support from a foreign institution or government. Such Personal Interests must be disclosed via the Disclosure and Management of Interests Form: on appointment; annually; or as they arise or change.
Disclosing conflict of interest in specific process or matter	Applies to all University representatives who participate in specific processes, for example: committee membership; recruitment panels; academic promotion panels; grant and award panels; research projects(including student research projects), grant proposals, research dissemination or publication etc.; partnership or contractual negotiations with other entities.	Disclose to the relevant chair, committee or project manager as appropriate prior to the meeting or at the meeting. Conflicts of Interest should be a standing agenda item to ensure transparency in decision making. Document in relevant minutes, reports or other written records of the meeting or process. If appropriate, the management response to the conflict of interest should also be documented (for example, a notation that the individual abstained from voting). Fully disclose and inform others who may be impacted (e.g., stakeholders, research co-investigators, research participants, publishers and journal editors, collaborating institutions or the public). For research processes and projects (including student projects), conflicts of interest must be transparently disclosed and a record established, which encompasses disclosure and management at the point of proposing research and at multiple points throughout the research process (including for example to: relevant committees, funding bodies, research participants, other team members, editors/publishers, users and/or the public). Students enrolled in, or intending to enrol in, a graduate research course must follow the direction of the Graduate Research Academy and their supervisor in disclosing and managing interests related to their candidacy and research project.
Disclosing ongoing conflict of interest	Applies to all University representatives. Includes longer-term or ongoing conflicts of interest, or conflicts of interest beyond a specific process or matter.	Disclose in writing to manager/supervisor or other relevant University official (e.g., Chair). Disclose as conflicts of interest arise or change in nature. A Disclosure and Management of Interests Form is required to be completed, including a Conflict of Interest Management Plan. To be recorded on the Disclosure and Management of Interests Register.

Managing a Conflict of Interest

(20) The relevant manager/supervisor or other relevant University official must assess the declaration of conflict of interest, determine whether an actual, potential or perceived conflict of interest exists and, if so, establish and document appropriate arrangements for its management.

Assess the risk

(21) In developing a plan, the manager/supervisor or other relevant University official should consider the level of risk posed by the conflict of interest. Factors that should be considered when assessing the risk include:

a. the relevant work area and the type of workplace activity undertaken;
b. any overlap in the domain of the individual's work at the University and the Personal Interest;
c. the extent of the individual's involvement and influence;
d. how much and how easily a Personal Interest can be favoured;
e. a deviation from process or probity; and
f. potential consequences.

Consider the management options and document a management plan

(22) In managing a conflict of interest, measures that are proportionate to the nature of the conflict must be taken in order to reduce risk to an acceptable level.

(23) For many low-risk conflicts of interest, disclosure and recording may be the only management strategy required.

(24) For other more substantive conflicts of interest additional, proportionate measures may need to be taken to reduce risk to an acceptable level. Such measures must be documented in a Conflict of Interest Management Plan, as part of the Disclosure and Management of Interests Form.

(25) Declarations that could be reasonably seen to have a higher risk profile for the University should be referred by the supervisor to the Executive Dean, Deputy Vice-Chancellor or Vice-Chancellor for review and determination of appropriate action. If there is doubt or ambiguity as to the risk, a supervisor reviewing a declaration should consult with their manager or with Human Resources.

(26) For research-related conflicts of interest, the Conflict of Interest Management Plan must address any required disclosure to funding bodies (including but not limited to the Australian Research Council (ARC) and NHMRC), research participants, publishers and journal editors, collaborators and the public.

(27) Conflict of Interest declarations and management plans involving entities in which the University holds or intends to hold a commercial or financial interest (including not limited to start-ups/spin out companies, or joint ventures) where the entity's activity overlaps with an area of research activity at the University may require additional external or independent review pathways and requires approval by an appropriate independent senior delegate in the Office of the Deputy Vice-Chancellor (Research).

(28) Recommended management strategies in relation to a conflict of interest include:

Strategy	Description	Examples when it can be used
Record	Record the existence of a Conflict of Interest	All conflicts of interest must be recorded and disclosed to relevant stakeholders (e.g., committee members, research team members or research participants) at a minimum. Conflicts of interest should be a standing meeting agenda item to ensure transparency in decision making. In a committee setting, a person with a conflict of interest may request that their opinion be presented last to avoid subjectivity in discussion.
Restrict	Limiting involvement in the matter	Most useful when a decision can be made using existing arrangements (e.g., committee decisions where an individual can 'step-out' for the discussion and/or decision). Can only be used where the conflict of interest arises periodically.
Recruit	Involving another non-conflicted individual in the matter	When a decision cannot be made without the conflicted University representative, then another non-conflicted individual should be involved to ensure transparency in the decision-making process (e.g., peer review of research papers).
Remove	Completely removing the individual from the matter	For ongoing conflicts where restricting or recruiting may not be appropriate (e.g., removal from a project where the main contractor is a related party; removal of an individual from assessment or supervisory duties where a relationship exists with a student).
Relinquish	Relinquishing the Personal Interest	Where a Personal Interest may be relinquished (e.g., shareholding).
Resign	Resigning from position within the University	For significant ongoing conflicts of interest, where no other options are available.

(29) Assessment and advice on appropriate management strategies can be sought from relevant stakeholders,

e.g., Human Resources, General Counsel, Group Risk, Deputy Vice-Chancellor (Research) etc.

Implement and monitor

(30) The primary responsibility to adhere to the Conflict of Interest Management Plan rests with the University representative who has a conflict of interest.

(31) Their manager/supervisor (or other relevant University official) also has a role to monitor the implementation of the Conflict of Interest Management Plan.

(32) This includes monitoring any changes in a conflict of interest (including as a result of changes to professional standards or regulatory developments), and if required, reassessment of the Conflict of Interest Management Plan.

(33) The Conflict of Interest Management Plan must be recorded and updated as needed using the Disclosure and Management of Interests Form.

(34) The Head of Department/School or Unit Head must sign off on all Conflict of Interest Management Plans within their department/school or unit for oversight and visibility. Where a plan relates to the Head of Department/School or Unit Head themselves, approval must be obtained from their direct manager.

Escalation of issues

(35) If an issue arises in relation to the appropriate management of a Personal Interest (including but not limited to if two parties disagree about whether a conflict exists or how it should be managed) and it cannot be adequately mitigated or resolved by the manager/supervisor (or other relevant University official overseeing the matter), the matter must be referred to the Chief People Officer, or for research-related matters, to the Deputy Vice-Chancellor (Research), who will triage or manage the matter as appropriate.

Managing privacy

(36) Conflicts of interest can involve the disclosure of information that may be private in nature, such as details about personal finances and relationships. Personal information arising from any disclosure as required by this Policy will be managed in accordance with the Privacy Policy.

Roles and Responsibilities

Responsibilities of University Representatives

(37) University representatives play an important role in identifying and managing conflicts of interest and they must:

a. ensure that they are aware of their obligations under this Policy (as well as the equivalent policies and procedures of external bodies relevant to their work/role);
b. conduct themselves in accordance with University regulations, enterprise agreements, rules, standards, policies and procedures including Codes of Conduct (Student Code of Conduct/Macquarie University Code for the Responsible Conduct of Research);
c. submit an annual Conflict of Interest declaration using the University's Disclosure and Management of Interests Form. Where no conflict exists, a nil return must be completed;
d. maintain records of activities that may be relevant to the assessment of whether a conflict of interest exists;
e. comply with the disclosure of interest policies and procedures of relevant external bodies;
f. manage or arrange their Personal Interests as far as reasonably possible to ensure that conflicts of interest can be identified proactively;
g. disclose Personal Interests as outlined in this Policy;
h. identify, disclose, and manage conflicts of interest, in a timely manner, in consultation with their

manager/supervisor, or other relevant University official (e.g., Committee Chair), as appropriate;

i. if they are unable to raise the conflict of interest with their manager/supervisor or other relevant University official due to the nature of the conflict of interest, raise the issue with the Chief People Officer. For research-related conflicts of interest, the issue must be raised with the Deputy Vice-Chancellor (Research); and
j. develop a Conflict of Interest Management Plan in consultation with their manager/supervisor, or other relevant University official (e.g., Committee Chair) as appropriate, and implement and follow it.

Responsibilities of Managers/Supervisors, or other relevant University officials (including Committee Chairs)

(38) Managers/supervisors, and other relevant University officials (e.g., Committee Chairs) play an important role in encouraging appropriate behaviour to manage conflicts of interest and must:

a. be aware of the requirements of this Policy (and the equivalent policies and procedures of relevant external bodies, including periodic reporting of Disclosures and Management of Interests Forms to governance bodies or accountable authorities);
b. ensure direct reports complete a disclosure and management of interests form on an annual basis using the Disclosure and Management of Interests Form by the end of March each year(unless otherwise specified in clause 19);
c. manage any conflicts of interest disclosed to them in accordance with this Policy and monitor compliance with the disclosure of interest policies and procedures of relevant external bodies;
d. develop and implement a Conflict of Interest Management Plans in consultation with University representatives, where appropriate;
e. record any Conflict of Interest Management Plans via the Disclosure and Management of Interests Form;
f. if they become aware of a conflict of interest that may be significant or require action outside this Policy, raise the issue with the Chief People Officer or Deputy Vice-Chancellor (Research) for research-related matters; and
g. ensure that all matters are treated confidentially and in accordance with the Privacy Policy.

Responsibilities of the University

(39) To ensure that conflicts of interest are identified, disclosed, and managed, the University will:

a. take steps to provide an environment where individuals are aware of their obligations under this Policy and can disclose Personal Interests and any conflicts of interest per this Policy;
b. promote and support a positive approach to the management of conflicts of interest by building an organisational culture that supports fairness, impartiality, integrity, and honesty through appropriate communication, training, and enforcement activities;
c. maintain confidentiality in the management of any conflicts of interest as far as reasonable;
d. ensure that any personal information pertaining to conflicts of interest is collected, stored, used or disclosed in accordance with the Privacy Policy;
e. provide a sound framework, including policies and procedures, to guide individuals in the exercise of their professional responsibilities to address the risks associated with conflicts of interest; and
f. ensure that the business units that are responsible for ensuring that agreements, terms of reference, and other instruments governing the engagement of University representatives who are not staff of the University include an obligation to comply with this Policy.

Failure to Identify, Disclose and Manage a Conflict of Interest

(40) Alleged or actual failure to identify, disclose, or manage conflicts of interest or other breaches of this Policy by University representatives will be managed according to the appropriate Enterprise Agreement in relation to the Staff

Code of Conduct and/or in relation to the Macquarie University Code for the Responsible Conduct of Research, following the Macquarie University Research Code Complaints, Breaches and Investigation Procedure. Outcomes of finding of a breach of this Policy may involve:

a. disciplinary action, termination of employment, removal of role/duties or any other action in accordance with the applicable policy or industrial instrument and/or contract;
b. referral to or action by agencies such as the Audit Office of NSW, Independent Commission Against Corruption (ICAC) and the NSW Ombudsman;
c. legal action against the individual or the University; and/or
d. other corrective actions or consequential actions being imposed by the University or by funders (including but not limited to the ARC and/or NHMRC), such as suspension or termination of research or research funding, or the repayment of funds.

(41) Where a potential breach of this Policy involves a University representative who is not a staff member or researcher, the matter will be managed in accordance with the terms and conditions of the relevant engagement, appointment, or agreement under which the individual acts on behalf of the University. Possible outcomes of a breach may include termination or variation of the engagement, appointment or agreement, removal from a committee or advisory role, restriction of access to University systems or premises, and other actions as determined by the relevant senior delegate.

Disclosure and Management of Interests Register

(42) To ensure transparency and accountability, all disclosures of interest and Conflict of Interest Management Plans will be recorded in the University's designated register. The register, maintained by Human Resources, provides a central record to support reporting, monitoring and auditing activities relating to the University's conflict of interest management processes.

(43) Access to view individual declarations recorded in the register are restricted to the University representative, the nominated manager/supervisor and Human Resources.

(44) In exceptional circumstances, including where a University Representative has a reasonable concern about disclosing a conflict of interest to their manager/supervisor, the University Representative may nominate the Chief People Officer as the alternative University official to assess their declaration on the Disclosure and Management of Interests Form. The Chief People Officer will assess the matter and determine the appropriate management arrangement.

Section 3 - Procedures

(45) Nil.

Section 4 - Guidelines

(46) Nil.

Section 5 - Definitions

(47) The following definitions apply for the purpose of this Policy:

a. Conflict of Interest Management Plan means a plan that records the management of a conflict of interest under this Policy.

b. Disclosure and Management of Interests Form means an online form to disclosure a conflict of interest under this Policy.
c. Key Management Personnel (KMP) means those persons having authority and responsibility for planning, directing and controlling the activities of the University or its Controlled Entities, directly or indirectly.
d. Personal Interest means any interest other than specific Professional Obligations as a University representative. Personal Interest may be personal, familial or other professional or organisational interest, which can bring, or be perceived to bring, financial or non-financial benefits. It may be pecuniary, involving an actual or potential financial gain, or non-pecuniary without any financial element, such as personal academic standing and reputation, or advancing the interests of associated individuals or groups (including friends, relatives, or competitors).
e. Professional Obligations mean obligations, responsibilities or duties performed as a University representative, whether academic, research, or professional. These responsibilities include being aware of and acting within the laws, regulations, enterprise agreements, rules, standards, codes of conduct, policies, and procedures that apply to their conduct at the University. It also includes power, authority, duty, or function that is conferred on the individual as a University representative.
f. Student means a person enrolled in a program or unit of study provided by the University at the time that a Disclosure or Formal Report is received by the University and includes a person in a pathway program, an undergraduate or postgraduate program, a cotutelle program, or a visiting student.
g. University representative has the meaning provided in clause 3.

Status and Details

Status	Current
Effective Date	3rd August 2026
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Responsible Executive	Eric Knight Deputy Vice-Chancellor (People and Operations)
Responsible Officer	David Ward Chief People Officer
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