**Canberra Health Services**

**Procedure**

**Managing a Conflict of Interest**

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| Purpose |

This procedure aims to provide Canberra Health Services (CHS) employees, contractors or volunteers with information about their responsibilities in managing any conflict of interest which may arise in the workplace.

CHS is committed to ensuring conflicts of interest that could be seen as influencing the performance of duties and outcomes of processes, are identified, disclosed and managed in a transparent and accountable manner and in favour of the public interest.

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| Alerts |

CHS employees must:

* abide by the *Public Sector Management Act* 1994 (PSMA), ACT Public Sector Integrity Policy and the ACT Public Service Code of Ethics
* take all reasonable steps to avoid a conflict of interest
* declare or manage a conflict of interest that cannot reasonably be avoided
* in cases where the conflict of interest relates to close personal relationships in the workplace, delegates should seek advice from People and Culture at [CHSPeople-Culture@act.gov.au](mailto:CHSPeople-Culture@act.gov.au) on the most appropriate action.

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| Scope |

This procedure applies to all CHS employees, whether they are permanent, temporary, casual or volunteers. This included Visiting Medical Officers and contractors.

The procedure does not cover employees treating family members or close friends. CHS employees from regulated health professions are subject to the professional standards regarding professional and personal boundaries of their relevant regulator, e.g. the Australian Health Practitioner Regulation Agency (AHPRA).

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| Section 1 – What is a conflict of interest? |

Conflicts of interest arise when a staff member’s ability to act equally, fairly and impartially has the potential to be compromised, or may be perceived to be compromised by a competing interest.

Competing interests can be actual, perceived or potential and may arise through personal/private interests, or through separate professional interests.

**Actual conflict of interest**

An actual conflict of interest involves a direct conflict between an employee’s current duties and responsibilities and existing private interests.

**Perceived conflict of interest**

A perceived or apparent conflict of interest can exist where an employee’s private interests have the appearance of improperly influencing the performance of their employment duties and responsibilities.

**Potential conflict of interest**

A potential conflict of interest arises when an employee has a private interest that could conflict with their employment duties and responsibilities in the future.

Refer to Attachment 1 for examples of conflicts of interest.

**Personal** or **private interests** are those interests that can bring personal benefit or advantage, or the perception of a personal benefit or advantage, to an employee as an individual or to other people.

This includes personal, professional or business interest that an employee has and the personal, professional or business interests of the individuals or groups an employee associates with.

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| Section 2 – How may a conflict of interest arise? |

Employees are responsible for identifying and declaring their own conflicts of interest. The following questions will help in making an assessment:

* Do I, a relative, friend or associate stand to gain/lose financially in any way from a decision or action that I make in the course of my duties?
* Have I made any promises or commitments in relation to the matter?
* Have I received a benefit or service from someone who stands to lose or gain from the decision/action?
* Am I a member of an association, club or professional organisation, or do I have particular ties and affiliations with organisations or individuals, who stand to lose or gain from CHS’ consideration of the matter?
* Could there be benefits for me in the future that could cast doubt on my objectivity?
* If I do participate in assessment or decision-making, would I be happy for my colleagues and the public to be aware of any association or connection?
* Would a fair and reasonable person perceive that I was influenced by personal interest in performing my public duty?
* Do I need to seek advice or discuss the matter with an objective party?
* Am I confident of my ability to act impartially and in the public interest?

If the answer to any of these questions is “yes” then you should make a Conflict of Interest Declaration.

Areas that are of a higher risk for conflicts of interest to arise include:

* recruitment and selection processes and making appointments to positions
* managing employees
* purchasing/procurement and contracting
* exercising delegations
* coordinating medical wait lists and access to clinical trials
* having discretion for planning or development applications
* disposing of assets
* undertaking investigations
* carrying out regulatory tests and procedures
* inspecting, regulating or monitoring standards, businesses, equipment or premises
* issuing qualifications or licences
* allocating grants of public funds
* issuing or reviewing the issue of fines or other sanctions
* interacting regularly with the private sector
* providing subsidies, financial assistance, concessions or other relief to those in need
* making determinations or handing down judgement about individuals or disputes
* providing consumer advice.

Conflicts of interest can also occur when:

* an employee undertakes secondary employment in another public sector agency or in the private sector
* an employee’s role requires them to take on another public sector or community-based role, in conjunction with their CHS role, e.g. to also be a member of an advisory committee or board
* an employee with more than one role acquires confidential information that could be useful in relation to their work in another role.

Refer to Attachment 1 for examples of conflicts of interest.

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| Section 3 – Roles and Responsibilities |

**All Employees**

* Perform duties in a fair and unbiased way and not make decisions affected by self-interest or personal gain.
* Comply with Section 9 of the PSMA, Section 5.1 of the ACT Public Sector Integrity Policy and the ACT Public Service Code of Ethics.
* Be aware of their obligation to identify and assess private and personal interests and whether they conflict or have the potential to conflict with their official duties.
* Avoid wherever possible placing themselves in a position where a conflict of interest may occur, and manage those conflicts of interest that cannot be avoided.
* Declare immediately any conflict of interest or potential conflict of interest and complete a Conflict of Interest Declaration (Attachment 2).
* Advise their manager that they may be conflicted, when sitting as a member of or chairing a Selection Advisory Committee (recruitment) and they become aware that applicants for the vacant position include either immediate family members or close friends or associates.
* When such instances arise, the employee must immediately remove themselves from further involvement in the process until the manager/delegate/ Senior Executive with Responsibility for Business Integrity and Risk (SEBIR) decides what should happen.
* Advise their manager if they have a close personal relationship in their workplace that may represent a perceived, potential or actual conflict of interest.
* This includes declaring a conflict of interest, whenever it arises, as soon as the employee realises that they will be working with a colleague who is a family member or personal friend.
* Report any suspected breaches of this procedure to their manager or director.
* Treat all persons equally and fairly and not show preference to any individual or organisation.

**Managers**

* Make employees aware of this procedure, the obligations it places on them, and how they should be dealt with.
* Understand that CHS has a strict policy requirement whereby employees who are in a position of influence (e.g. chairs of Selection Advisory Committees in recruitment rounds or on a panel to decide a successful tenderer for service/product to CHS), are required to declare immediately if they have or may have a conflict of interest:
* Where a manager receives a declaration of a perceived, potential or actual conflict of interest from one of their subordinates, the manager must consider the reported conflict of interest and refer it to the appropriate delegate/SEBIR as necessary, for consideration and a decision regarding resolving the conflict.
* In the interim, the line manager should advise the employee not to take further action in relation to the real or perceived conflict of interest until a decision has been made by the Executive Director(ED)/Executive Group Manager(EGM) /delegate/SEBIR.
* Additionally, managers should carefully consider whether the positions under their supervision are at risk of potential conflicts of interest, and discuss these risks with their subordinates. Where it is considered a conflict or perceived conflict exists, the manager should raise this with the appropriate delegate.
* Ensure that meeting participants have an opportunity to declare any conflict of interest in relation to items on the meeting agenda.
* Monitor the work of staff and the risks to which they may be exposed, and implement preventative strategies.

**Executives/delegates**

* Ensure that employees are aware of this procedure.
* Receive Conflict of Interest Declarations made by employees, students, volunteers or contractors within their Division/Branch and determine action to be taken in each case:
* Upon receipt of a disclosure of a conflict of interest, the Executive/delegate is responsible for determining whether a conflict of interest exists.
* Once a decision has been made on how the real or perceived conflict of interest should be managed, the decision is to be clearly communicated to the employee concerned in writing, stating what the expectations are, or the actions which are required of the employee.
* A manager may also receive and deal with complaints of possible conflicts of interest from third parties (e.g. employees who are outside the potential conflict of interest situation).
* Seek the advice of the Senior Executive Responsible for Business Integrity and Risk (SERBIR) when uncertain about the course of action.
* Retain Conflict of Interest Declarations on a confidential file.
* Investigate potential breaches consistent with relevant Enterprise Agreements and professional standards.
* Notify the SERBIR of the outcome/decisions which have been made in conflict of interest cases, for inclusion on the Conflict of Interest Declarations Register.

**SERBIR**

* Provide information and advice to executives and managers where a conflict of interest may arise or has been declared.
* Maintain the Conflict of Interest Declarations Register in respect of delegates’ decisions on conflict of interest.

**People and Culture**

* Ensure that staff orientation includes information about the need to declare any conflict of interest and the means by which this is done.

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| Section 4 – Declaring a conflict of interest |

**Alert:**

* Employees must declare all conflicts of interest (whether actual, potential, perceived, finanical or non-financial) in writing as soon as possible.
* Disclosures are to be treated as confidential where ever possible.

**Employees reporting their own actual or potential conflict of interest**

1. Report the conflict of interest (whether actual, potential, perceived) in writing to the immediate supervisor and/or an authorised officer using the Conflict of Interest form (Attachment 2).
2. Discuss the conflict of interest with the immediate supervisor and/or an authorised officer.
3. Provide form to Divisional Executive for approval.
4. Once approved provide the completed form to the SERBIR by email ([CHS.SERBIR@act.gov.au](mailto:CHS.SERBIR@act.gov.au)).

Where it is not possible to provide a written declaration, for example while a staff member is participating in a recruitment panel, tender evaluation panel, inspection or investigation, a verbal declaration can be made by the employee to their immediate supervisor or the senior officer managing the event. All verbal declarations must be followed by a declaration in writing as soon as possible.

Where a matter requires assessment, employees should not participate in decision-making related to the conflict until a determination has been made and a resolution put in place.

**Employees who become aware of another employee’s possible conflict of interest**

1. Discuss the conflict of interest (whether actual, potential, perceived) with the employee concerned.

Note:

If this is uncomfortable raising it with the individual concerned seek advice from the immediate supervisor.

1. If after raising the issue it becomes apparent that a conflict has not been declared, seek advice from the immediate supervisor or an authorised officer.

If the matter involves possible corrupt conduct, employees must report the matter to the Executive Group Manager, People and Culture.

If the matter involves possible corrupt conduct, misconduct and/or serious and substantial waste of public resources, employees should also be aware of protection provided in relation to public interest disclosures under the *Public Interest Disclosure Act* 2012 (ACT).

The Fraud and Corruption policy and associated plan informs employees of their responsibilities to identify and report fraud, corruption and other criminal offenses that could affect CHS. Potential fraud may include undeclared conflicts of interest, an unusual event or action with a suspicious reason and unauthorised changes to processes or work practices. CHS employees should report concerns to their line manager in the first instance, or if a more serious issue, then to SERBIR at [CHS.SERBIR@act.gov.au](mailto:CHS.SERBIR@act.gov.au)

Members of the general public are also able to make a complaint if they have reason to believe that management or an employee of CHS has a conflict of interest.

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| Section 5 – Assessing a conflict of interest |

Once declared to the delegate, the conflict of interest should be reviewed without delay and discussed with the staff member involved. Feedback should be provided within seven calendar days.

If the delegate is uncertain about the course of action to take, they should consult the SERBIR. It may also be necessary to seek legal advice from the Government Solicitors Office (see Request for Legal Advice procedure, available on the Policy and Guidance Documents Register).

In cases where the conflict of interest relates to close personal relationships in the workplace, delegates should seek advice from People and Culture at [CHSPeople-Culture@act.gov.au](mailto:CHSPeople-Culture@act.gov.au) on the most appropriate action.

Delegates should not assess a conflict of interest if it relates to themselves or someone with whom they have a close personal relationship. In such cases the matter should be referred to another executive, or SERBIR at [CHS.SERBIR@act.gov.au](mailto:CHS.SERBIR@act.gov.au)

Reporting potential or actual conflicts may involve disclosing personal information. This information is to be handled in such a way that privacy is appropriately managed, having regard to the circumstances.

The table below can assist delegates when assessing a declared conflict of interest.

**Matters to consider when assessing a conflict of interest**

What is the nature of the relationship that could give rise to the conflict?

Is the matter financial or not?

Should legal advice or advice from the SERBIR or People & Culture be sought?

Has enough information been provided to allow a proper assessment?

Could the person’s involvement in this matter cast doubt on their integrity?

Could the person’s involvement damage the reputation of CHS or the ACT Government as a whole?

How would it look to a member of the public?

What is the best option to ensure impartiality, fairness and protection of the public interest?

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| Section 6 – Managing a conflict of interest and consequences for non-disclosure |

If an employee fails to disclose a conflict of interest or refuses to take any action directed by the delegate to resolve or properly manage a conflict of interest, or acts to the disadvantage of the public interest, the employee may be subject to disciplinary action.

Appropriate investigations and disciplinary actions may be taken, as set out in the Enterprise Agreements, Public Sector Management legislation and standards, and professional standards and legislation (e.g. *Health Practitioner Regulation National Law (ACT) Act* 2010).

Disciplinary action may include termination of employment.

Additionally, the employee’s behaviour may also amount to corrupt conduct or abuse of office, requiring the matter to be referred to the ACT Integrity Commission (please see the Public Interest Disclosure Guidelines, available on the Policy and Guidace Documents Register), and could result in criminal charges.

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| Section 7 – Options for dealing with a conflict of interest |

The options available to manage a conflict of interest are dependent on the type of conflict (i.e. financial or non-financial). A broader range of options exists for dealing with conflicts of interest that do not have a financial component.

Generally, if a financial interest is disclosed, that employee must not be involved in consideration, discussion or decision making related to the matter in which they have interest.

Choosing the right option to deal with a conflict will depend on the circumstances and assessment of the conflict. Options can include:

* **Registering the conflict of interest in the Conflict of Interest Declarations Register**. All conflicts of interest must be registered, with SERBIR, using the Conflict of Interest Declaration form (See the HealthHUB at: <https://healthhub.act.gov.au/governance/integrity>). The conflict may be eliminated by disclosure or effective supervision. CHS is required to maintain a conflict of interest register that records details of conflicts of interest and how they have been managed**.**
* **Restricting involvement in the matter that gives rise to the conflict**. Any employee who has a declared conflict of interest may be asked to withdrawing from discussion of affected proposals or be given restricted access to sensitive information. This option can be useful when it is possible to separate the employee with the conflict from parts of the activity or process, or when the conflict is not likely to arise frequently.
* **Removing the individual with the conflict from the matter entirely**. This may be appropriate where the conflict is serious and ongoing and ad hoc restriction or recruitment of others may not be feasible.
* **Recruiting a disinterested third party to oversee part or all of the process that deals with the matter**. When it is not practical or desirable to remove the individual with the conflict from the decision-making process, such as in small communities, or when there is specific expertise that needs to be retained (eg. for tendering or recruitment selection panels) a third party can be bought in to oversee the process.
* **Reviewing or restarting the decision making process**. In rare situations this may not be possible, for example, if a conflict of interest is identified at or near the conclusion of a process.
* **Relinquishing or divesting the private interest**. This may be appropriate where the individual is more committed to their public duty than their private interest. Options may include liquidating or withdrawing from the private interest.
* **Resigning from the public sector agency**. This is the most extreme solution to a serious conflict of interest, which may need to be considered if the conflict cannot be resolved in any other way.

Once a course of action has been determined by the delegate they should record their decision on the Conflict of Interest Declaration form, with any supporting information and reasons for the decision. This should be retained on the employee’s personal file for future reference, a copy must be forwarded to the SERBIR and another copy should be provided to the employee.

All declarations of conflicts of interest and the subsequent decision process must be readily accessible should the management of a conflict of interest be questioned.

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| Section 8 – Monitoring a conflict of interest |

To ensure the option chosen to manage the conflict of interest remains relevant, it is important that the matter be reviewed by the delegate responsible for assessing the matter, in consultation with the employee concerned, on a regular basis, e.g. every six months. This should include:

* The original reason for declaring the conflict of interest
* The initial determinations and management decisions
* The strategy put in place to manage the conflict of interest
* Actions taken in implementing the management strategy
* Changes in the situation that may have an impact on the strategy
* Perceptions held by others as to whether the conflict is still having an influence on the matter
* Changes made to the management strategy and its implementation.

If changes to the situation are quite significant, it may be necessary to re-determine the approach to managing the conflict.

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| Evaluation |

**Outcome Measures**

* All conflicts of interest declarations are managed appropriately and outcomes of enquiries are documented in the Conflict of Interest Declaration Register.
* Information regarding conflict of interest and how it should be declared is included on all orientation schedules.
* The discussion and actions arising from declarations are documented and stored securely by the delegate, retrievable if a report of conflict of interest requires investigation and are accessible, to confirm that a matter of conflict of interest has been addressed.

**Method**

* Review of mandatory training will be conducted every 12 months to ensure all staff completed the Workplace Behaviours E-learning.
* Quarterly reporting to the ARMC regarding misconduct reporting.

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| Related Policies, Procedures, Guidelines and Legislation |

**Policies**

* Fraud and Corruption Control Policy
* Second Job
* Gifts and Benefits
* ACT Public Sector Integrity Policy
* Research Practice
* Recruitment

**Procedures**

* Second Job
* Gifts and Benefits
* Recruitment
* Donations, Fundraising and Seeking External sponsorship
* Recruitment of Senior Medical and Dental Practitioners
* Request for Legal Advice

**Guidelines**

* CHS Procurement Guideline

**Frameworks**

* Fraud and Corruption Control Plan

**Standards**

* Public Sector Management Standards 2016
* ACT Public Service Code of Conduct
* ACT Public Service Code of Ethics
* Allied Health Professionals ACT Standards of Practice
* Australian Accounting Standards Board 124 Related Party Disclosures (AASB 124)

**Legislation**

*Public Sector Management Act* 1994

*Government Procurement Act* 2001

*Health Practitioner Regulation National Law (ACT) Act* 2010

*Public Interest Disclosure Act* 2012 (ACT)

**Enterprise Agreements**

All ACTPS Enterprise Agreements 2018-21

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| References |

1. NSW Health Policy Directive: Conflicts of Interest and Gifts and Benefits (PD2015\_045). This document includes useful attachments with examples of conflicts of interests and options for their management.
2. Queensland Health Guideline 113-1:2020. This document contains some useful information in relation to managing conflicts of interest.

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| Definition of Terms |

**Conflict of interest**

A conflict of interest exists when it is likely that an employee could be influenced or perceived to be influenced, by a personal interest when carrying out their public duty. Conflicts of interest can be actual, perceived or potential.

* *An actual conflict of interest* involves a direct conflict between an employee’s official current duties and responsibilities and existing private interests.
* *A perceived or apparent conflict of interest* can exist where it could be perceived, or it appears, that an employee’s private interests could improperly influence the performance of the employee’s official duties and responsibilities – whether or not this is in fact the case.
* *A potential conflict of interest* arises when an employee has a private interest that could conflict with their official duties and responsibilities in the future.

A conflict of interest may involve otherwise legitimate private activity, personal affiliations and associations, and family interests, if those interests could reasonably be considered likely to improperly influence the employee’s performance of their duties.

**Competing interests/ conflict of duty**

Conflicts of interest can arise where a person has official roles in more than one public organisation. In these situations it may be difficult to keep the roles separate and this can lead to poor performance, improper decision making or improper use of information.

**Corruption**

Corruption is dishonest activity in which a person acts contrary to the interests of CHS and abuses their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.

**Close personal relationship**

A close personal relationship is one in which there is a close personal connection between employees. Close personal relationships include, but are not limited to, spouse, former spouse, intimate partner, former intimate partner, parent, child, sibling, grandparent, uncle, aunt, cousin, niece or nephew.

**Employees**

For the purposes of this procedure, “employee” refers to any person performing work for CHS, on a permanent, temporary or casual basis. It includes volunteers, contractors, visiting medical officers, students, consultants, and researchers performing work within CHS facilities.

**Financial and non-financial interest**

An ‘interest’ can either be *pecuniary*or *non-pecuniary*.A pecuniary interestis an interest that a person has in a matter because of a reasonable likelihood (or expectation) of financialgain to that person. A non-pecuniary interestis defined as any private interest, which does not pertain to money (e.g. kinship, friendship, membership of an association, society or trade union or political party).

**Personal or private interest**

Personal or private interests are those that can bring benefit or advantage to a staff member as an individual, or to others whom the staff member may wish to benefit.

**Senior Executive with Responsibility for Business Integrity and Risk (SERBIR)**

An executive nominated by the Chief Executive Officer responsible for the implementation of the integrity strategies and the processes for the detection and investigation of fraud and corruption. CHS’s SERBIR is the Deputy Chief Executive, Strategy, Policy and Planning.

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| Search Terms |

Conflict, interest, conduct, integrity, corruption, integrity, perceived, potential, SERBIR

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| Attachments |

Attachment 1 – Examples of Conflict of Interest

Attachment 2 – Conflict of Interest Declaration form

**Disclaimer**: *This document has been developed by Canberra Health Services specifically for its own use. Use of this document and any reliance on the information contained therein by any third party is at his or her own risk and Canberra Health Services assumes no responsibility whatsoever.*

*Policy Team ONLY to complete the following:*

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| --- | --- | --- | --- |
| *Date Amended* | *Section Amended* | *Divisional Approval* | *Final Approval* |
| *20/05/2021* | *Complete Review* | *Raelene Burke, EGM, People & Culture* | *CHS Policy Committee* |
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*This document supersedes the following:*

|  |  |
| --- | --- |
| *Document Number* | *Document Name* |
| *DGD17/031* | *Conflict of Interest* |
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## Attachment 1 – Examples of Conflict of Interest

The following examples\* are provided to give employees guidance in relation to identifying actual, perceived or potential conflicts of interest that may arise when performing their duties and functions in the public sector; such conflicts are to be avoided.

Each employee is responsible for assessing their individual circumstances and identifying their own conflicts of interest. When an employee is uncertain of the existence or potential existence of a conflict of interest, the employee is to discuss the matter with their manager or Workforce Relations in People & Culture.

\**The following are provided as examples only and are not exhaustive. Any resemblance to actual conflict of interest situations that have occurred are purely coincidental.*

*Recruitment and selection*

* An employee participating on a Selection Advisory Committee (SAC) fails to disclose to other panel members that her son’s girlfriend is an applicant for the role. The SAC member encourages other SAC members to shortlist the applicant.
* A manager who is chairing an SAC provides an applicant, who is a current employee, with a ‘heads up’ of the questions that will be asked at interview.
* An Executive Director makes comment to one of the managers in their team that their son is looking for a job and has applied for a current vacancy, for which the manager is chairing an SAC.
* A chair of an SAC uses their seniority to coerce other more junior SAC members to select a particular applicant for appointment.

*Employee management*

* A supervisor gives preferential rostering to a team member who is a close friend.
* The same supervisor allocates less favourable shifts to an employee who was previously dating the supervisor’s sister.
* An employee constantly receives higher duties opportunities over other employees who are more deserving. The employee is the sister-in-law of the approving delegate.
* A manager is dating a member of their team. The manager approves the team member attending a national conference they will also be attending.
* An employee working in a Division of CHS becomes aware that a new starter who has just commenced work in the Division is their niece.
* A line manager fails to address issues of continued late arrival and extended lunch breaks taken by a team member with whom they socialise outside of work.

*Secondary employment*

* In addition to performing full-time employment for CHS, an employee works in their family’s restaurant most nights until late. The employee has been observed seemingly asleep at various times during the workday.
* In addition to their employment with CHS, an employee runs their own small business. Each morning the employee diverts their personal mobile (i.e. their small business phone number) to their work phone. The employee receives regular calls relating to their private business on their work phone and spends extended periods of work time responding to private business calls during the day.
* A full-time CHS employee who works Monday to Friday is also registered with a private employment agency. On Tuesday the employee is contacted by the agency and offered work for the next three days. For each of the next three days the employee calls in sick each morning to their line manager. Meanwhile, the employee is undertaking casual work at a private company on those days, as arranged through the employment agency.
* A CHS employee works as a part-time registered nurse, working every Saturday at the Canberra Hospital Emergency Department. This person is also employed as a full-time project officer in another Directorate. The person has not disclosed to either of their public sector employers that they have another job and are working more than one full-time equivalent role for the ACT Public Service.

*Purchasing/procurement*

* A supply arrangement is due to expire. A key manager who uses the arrangement accepts a custom Christmas hamper from one of the preferred suppliers. The supplier subsequently asks the manager to be a referee for their new tender application.
* A company wishing to contract with CHS arranges a meeting with two employees to discuss business needs. At the end of the meeting the two employees accept an invitation to attend the next football home game as corporate box guests of the potential supplier.
* An employee taking part in the evaluation and selection of a supplier of healthcare products fails to disclose they have shares in one of the companies shortlisted for the contract.

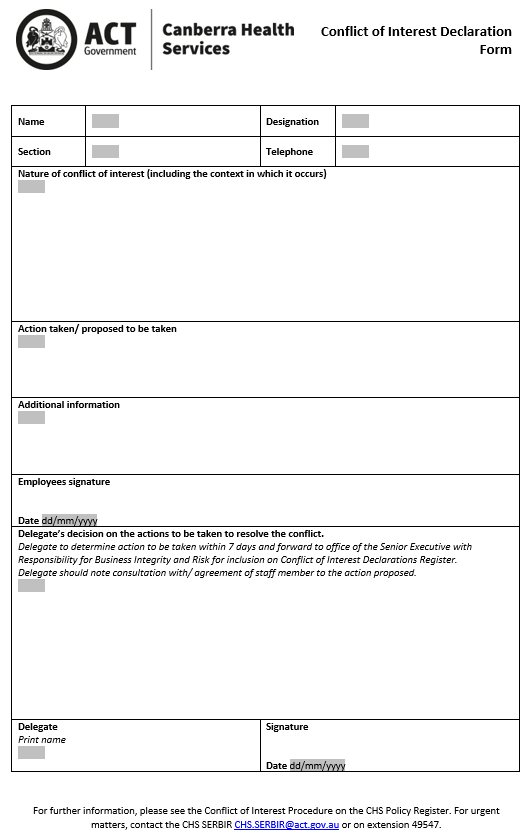
*Access to information*

* An employee’s partner operates a consultancy. The employee is aware of some upcoming consultancy opportunities. Unbeknown to the director of the work area, the employee provides their partner with details on the scope of the work required and the director’s contact email, work phone and mobile numbers.
* Without an official need, an employee with access to personnel records on Chris21 looks up and notes the home addresses and dates of birth of other employees in the organisation.
* An employee’s uncle is a Managing Director in a company tendering for CHS work. The employee downloads internal information off the CHS intranet and provides this to their uncle.
* A person who works in Directorate A has been engaged to undertake an internal review of a decision which has been made in Directorate B. The person’s partner works Directorate B. The Directorate B employee provides their partner with their personal thoughts and opinions on the Directorate B staff members who are involved in the internal review.

*Decision making*

* An employee gives preferential treatment to their neighbour by putting their file ahead of other patients who have been waiting longer.
* A person offers to donate $5,000 to the Canberra Hospital if a guarantee can be given to get the person’s partner on a new cancer drug trial.
* A CHS employee is required to provide supplier recommendations to clients as part of their role. One of the service providers has advised the employee that for every referral they receive the employee will get a kickback.

## Attachment 2 – Conflict of Interest Declaration Form



Sample