

# Conflicts of interest

## Human Resources Policy E17 (QH-POL-980)

### Purpose

The purpose of this policy is to outline Queensland Health's position and its commitment to ensuring all employees are aware of their obligations to identify, declare and resolve or manage conflicts of interest in favour of the public interest.

It is acknowledged that employees will encounter conflicts of interest in undertaking their public duties. To ensure Queensland Health maintains the highest level of integrity and public trust, all employees are required to comply with this policy.

### Application

This policy applies to employees of the Department of Health (the department) and Hospital and Health Services (HHSs).

This policy does not apply to employees of the Queensland Ambulance Service. Instead, Queensland Ambulance Service employees are to refer to their local policy/procedures.

This policy should be read in conjunction with the *Code of Conduct for the Queensland Public Service*, the *HR Guideline E17 - Conflicts of interest* made under this policy, and *HR Policy E1 Workplace conduct and ethics*.

### Delegation

The **delegate** is as listed in the relevant human resource (HR) delegations manual, as amended from time to time.

### Legislative or other authority

- Code of Conduct for the Queensland Public Service
- Crime and Corruption Act 2001
- Financial Accountability Act 2009
- Australian Accounting Standards Board 124 Related Party Disclosures
- Hospital and Health Boards Act 2011
- Information Privacy Act 2009
- Integrity Act 2009
- Managing the risk of psychosocial hazards at work Code of Practice 2022
- Public Sector Act 2022
- Public Sector Ethics Act 1994
- Directive 1/15 - Declaration of Interests – Chief Executives of Government Departments

- Directive 3/24 – Declaration of Interests – public sector employees excluding chief executives
- Directive 22/09 - Gifts and Benefits
- Public Sector Commission Declaration of Interests policy - Senior Executive Service and Equivalent Employees including Statutory Office Holders
- Public Sector Commission Guideline – Gifts and Benefits
- Work Health and Safety Act 2011

## Related policy or documents

- Department of Health Human Resource (HR) Delegations Manual
- HR Policy B1 Recruitment and selection (QH-POL-212)
- HR Policy C47 Aggregate and Concurrent Employment (QH-POL-301)
- HR Policy E1 Workplace conduct and ethics (QH-POL-113)
- HR Policy E9 Requirements for reporting suspected corrupt conduct (QH-POL-218)
- HR Policy E15 Corrupt conduct complaints involving the Director-General (QH-POL-419)
- HR Policy E10 Discipline (QH-POL-124)
- HR Policy H1 Separation of Employment (QH-POL-227)
- Hospital and Health Service Human Resource (HR) Delegations Manual
- HR Guideline E17 Conflicts of interest (QH-GDL-980-1)
- Financial management practice manuals
- Queensland Health policies on requirements for reporting corrupt conduct
- Queensland Government Procurement Policy 2021

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# Policy

## 1 Principles

Under the *Code of Conduct for the Queensland Public Service*, employees have the following responsibilities when performing official duties:

Principle	What it means for Queensland Health
Protect the Public Interest	<ul style="list-style-type: none"><li>• Employees must demonstrate a high standard of workplace behaviour and personal conduct.</li><li>• Employees must act ethically and use public resources to develop and deliver services to the community.</li><li>• Employees must ensure the public interest is not compromised during the management of conflicts of interest.</li></ul>
Transparency and accountability	<ul style="list-style-type: none"><li>• Employees will use public resources in an effective and accountable way.</li><li>• Employees know what is required of them in relation to identifying and declaring a conflict of interest.</li><li>• Employees have access to relevant and effective strategies to manage conflicts of interest appropriately.</li></ul>
Individual Responsibility and Personal Example	<ul style="list-style-type: none"><li>• Employees must identify and declare an interest that could influence or be seen as influencing, the performance of their duties.</li><li>• Employees are individually responsible for arranging private affairs as far as reasonably practicable to prevent conflicts of interest arising.</li></ul>
Building a supportive organisational culture	<ul style="list-style-type: none"><li>• Employees are aware of their obligations regarding identifying and declaring conflicts of interest.</li><li>• Employees have access to processes for identifying risk and dealing with emerging conflict so interest.</li></ul>

### Human rights

Under the *Human Rights Act 2019* Queensland Health has an obligation to act and make decisions in a way that is compatible with, and gives proper consideration to, human rights. When deciding or acting under this policy, managers and decision-makers must comply with that obligation.

## **Reframing the State's relationship with Aboriginal peoples and Torres Strait Islander peoples**

Queensland Health is committed to supporting a reframed relationship with Aboriginal peoples and Torres Strait Islander peoples in accordance with Chapter 1 Part 3 of the *Public Sector Act 2022*. All delegates and employees have a responsibility to apply these principles when implementing HR policies.

## **Managing the risk of psychosocial hazards at work Code of Practice 2022**

Queensland Health is committed to promoting and protecting the physical and psychological health, safety and wellbeing of its workers by providing a safe and inclusive workplace with a focus on preventing harm. As an employer, Queensland Health has an obligation under the *Work Health and Safety Act 2011* to manage risks to employees arising through our work, work environments, systems and practices. When applying this policy, proper consideration must be given to the *Managing the risk of psychosocial hazards at work Code of Practice 2022*, including identifying psychosocial hazards and assessing and managing any risks.

## **2 What is a conflict of interest?**

Under *Directive 03/24 - Declaration of interests – public sector employees excluding chief executives*, a **conflict of interest occurs when an employee has a personal interest that conflicts, or may conflict, with the discharge of the employee's duties.**

For a personal interest to give rise to a conflict, there needs to be a logical connection between an interest of the employee and a relevant, official matter being considered by the employee, that can affect, or be perceived to affect the decision to be made, action to be taken, or compromise judgement in relation to the matter.

**Having a conflict of interest is not unusual and it is not wrongdoing in itself. However, failing to declare and manage the conflict appropriately is likely to be wrongdoing.**

A conflict of interest may arise from:

- **an interest (actual conflict)**

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

- **when it might reasonably appear to others that personal interests could impact the performance of official duties (perceived conflict)**

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 their official duties and responsibilities – whether or not this is in fact the case.

- **a current interest where it is foreseeable that a conflict may arise in the future (potential conflict)**

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.

Refer to the *HR Guideline E17 - Conflicts of interest* for scenarios of conflicts of interest.

### 3 Areas a conflict may occur

#### Gifts and benefits

Employees must declare any gifts and benefits received as part of their official duties to avoid any perception of conflicts of interest or inappropriate influence. Gifts and benefits may also be offered by colleagues and co-workers.

The acceptance of any benefits other than incidental or token gifts, customary hospitality, or benefits of a nominal value, may be deemed a conflict of interest. There are two main considerations:

1. Why was the offer made? Consider the timing and purpose - if an employee is in a sensitive role where they make decisions that affect the department or the government, a gift which may not be high in value, may still be intended to influence and should be declined or declared.
2. What would the public perception be?

Any gift or benefit valued at more than \$150 on an annual basis, must be reported. Any offer of cash, or items which can be readily converted into cash (e.g., lottery tickets, scratch cards (scratchies), shares, store gift cards) **must be refused**.

Refer to the financial management practice manual for your department/HHS and *Directive 22/09 - Gifts and Benefits* and guideline. Gifts and benefits declarations are to be submitted in accordance with departmental or HHS processes.

#### Personal relationships

Personal relationships between employees within Queensland Health may occur. Whilst these relationships are not prohibited and are private in nature, they may give rise to an actual, potential or perceived conflict of interest. Conflicts of interest can also occur in relation to Aboriginal peoples and Torres Strait Islander peoples, regarding familial and kinship connections, particularly across broader communities.

Queensland Health considers any personal relationships involving people in a **direct hierarchical relationship** (i.e., in the same reporting line, where one person has supervisory or decision making authority over the other) to represent a potential conflict of interest. The risks of potential conflicts of interest are likely to be heightened for officers in senior leadership positions.

Employees in such a relationship must disclose the relationship or kinship to their manager or delegate or other culturally capable officer. This disclosure will allow for the development, implementation and management of resolution strategies. Any resolution strategy must be culturally safe, avoid discrimination or action that unfairly impacts upon a person's employment and should be commensurate with the seriousness of the identified risk.

Employees who are in a personal relationship **without a direct hierarchical relationship**, are required to manage the risk of a conflict of interest arising and must disclose their relationship where an actual, potential or perceived conflict of interest cannot be appropriately avoided.

Declarations of personal relationships can be made in confidence to protect personal privacy with only relevant persons (this may include a local human resources team or ethical standards/integrity unit) being advised of the conflict of interest and any arrangements necessary to manage it.

### **Other employment**

It is acknowledged that many Queensland Health employees undertake paid employment concurrently or in aggregate across different HHSs or work units, or for other employers, both in the public and private sector. Regardless of any commitments to other employers, it is expected that a Queensland Health employee will be able to perform their Queensland Health job efficiently and effectively.

Employees carry the onus of responsibility to declare other employment or relevant unpaid work, as required by this policy.

Employees are required to discuss potential other employment with their manager and consider whether it is necessary to lodge a conflict of interest declaration if the other employment may:

- be a real or apparent conflict of interest with their employment within Queensland Health
- have the potential to impact adversely on their ability, health or well-being to safely and effectively carry out official duties within Queensland Health
- have the potential to compromise the integrity of Queensland Health or to reflect seriously and adversely on Queensland Health
- result in or have the potential to result in the misuse of information, intellectual property, physical or other public resources belonging to Queensland Health.

Declarations are to explain the nature of the other employment and include the name of the other employer, duties undertaken, location of work, total hours worked and rostering arrangements as well as any current or impending links the other employer has with Queensland Health. The written declaration should follow the same steps in the procedure at Attachment 1 as all other declarations.

This also includes holding multiple roles within Queensland Health.

When employees change roles or take on an additional role within Queensland Health, they must inform their new manager of any approved other employment and provide the manager with a copy of the delegate's approval. When the potential for conflict of interest arises due to the changed circumstances, the employee must submit a new or revised declaration.

The delegate may re-consider an employee's circumstances and, when appropriate, withdraw a previous approval to engage in other employment when an employee's circumstances change and/or new information is identified which leads to a revised determination that a real or perceived conflict of interest exists.

### **It is important to note**

- Employees must adhere to their obligations under *HR Policy C47 Aggregate and Concurrent Employment*.
- Rostering systems differ across Queensland Health and therefore it must never be assumed that all payroll systems are connected and share information.
- Secondary and concurrent employment could provide the opportunity for personal loss or gain, such as using confidential information obtained from the government workplace/s or conducting personal business during work time.
- Employment as a public sector employee does not remove the right to be active privately in a political party, professional organisation or trade union.
- As a member of a political party, however, employees must be aware that participating in activities in the public arena, where they may be identified as a public sector employee, can give rise to a perception of conflict of interest. Where this situation arises, employees must declare and manage their activities in accordance with this policy.
- If elected as workplace representatives or officials of a trade union or professional association, employees are not required to seek permission from Queensland Health before speaking publicly in that capacity, and employees need to ensure that comments are made only on behalf of that organisation.
- In all instances, employees must comply with the appropriate laws of privacy, confidentiality and information management.

### **Other areas a conflict may occur**

There are many areas of work and organisational functions within the public sector that may create a high risk for potential conflicts of interest, including (but not limited to):

- recruitment and selection processes and making appointments to positions
- coordinating medical wait lists and access to clinical trials
- carrying out regulatory tests and procedures
- managing staff
- having discretion for planning or development applications
- inspecting, regulating or monitoring standards, businesses, equipment or premises
- purchasing/procurement and contracting
- disposing of assets
- issuing qualifications or licences
- exercising delegations
- undertaking investigations
- 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.

#### 4 Avoiding conflicts of interest

While having a conflict of interest is not necessarily wrong, employees should avoid placing themselves in conflicting situations where it is practical to do so. This can be achieved by avoiding:

- assignments and tasks that could conflict with private interests (which should be discussed with their manager).
- investments or financial arrangements that might relate to public duties.
- commercial dealings with suppliers and other stakeholders that are affiliated or related to personal interests.
- situations in which professional relationships could develop into personal relationships.
- social media activity that could be perceived as compromising impartiality.

#### 5 Roles and responsibilities

Regardless of an individual's position title or contract, executives, managers and employees have the following responsibilities under this policy:

##### **Employees**

- upon appointment, annually, or as their circumstances change, they are to consider their private and personal interests and whether they conflict, could be perceived to conflict, or have the potential to conflict with their official duties. NOTE: A change in duties may also result in a change to information that must be declared.
- formally declare all conflicts of interest in accordance with the procedures of this policy.
- report reasonable suspected breaches of this policy in accordance with the *Code of Conduct for the Queensland Public Service*.
- report any corrupt conduct (e.g., abuse of public office) when they have an honest belief, on reasonable grounds, that corrupt conduct has occurred (refer to *HR Policy E9 - Requirements for suspected reporting corrupt conduct*).
- comply with any other requirements of this policy.

##### **Managers**

A manager and delegate, who is advised by their employee about a conflict of interest, must:

- consider any cultural safety impacts (for example, kinship/extended family relationships, privacy, information sharing, cultural safety, options and ownership).
- ensure they have a sufficient level of cultural capability to provide necessary support and advice when Aboriginal peoples and Torres Strait Islander peoples are required to make declarations of interest or conflicts of interest.



- ensure the declaration is documented in accordance with the procedures of this policy.
- if necessary, make further enquiries to verify the accuracy and completeness of the declaration.
- refer to any additional conditions within the HR delegations manuals (departmental and HHS), and/or any other relevant officers or operational leads.
- together with the affected staff member, discuss, document and record how the conflict will be managed (i.e., refer to the six management options in the procedure of this policy: register, restrict, recruit, remove, relinquish, resign).
- monitor the situation at regular intervals to ensure any agreed management plan is complied with and remains appropriate.

A manager who is not a delegate must:

- ensure the declaration is documented in accordance with the procedures of this policy.
- if necessary, make further enquiries to verify the accuracy and completeness of the declaration.
- ensure the declaration is referred to the authorised delegate for their consideration and determination regarding the resolution of the conflict. An appropriate recommendation/s should be made to the delegate on how the conflict of interest could be managed.
- advise the employee not to take further action in relation to the conflict of interest until a decision has been made by the delegate.
- carefully consider whether any positions under their supervision are at risk for potential conflicts of interest and discuss the matter with relevant employees. Where it is considered that a conflict or perceived conflict exists, the matter is to be raised with the delegate.
- ensure that all employees under their supervision are made aware of their obligations to identify and report a conflict of interest in accordance with this policy.
- review previously documented conflicts of interest annually where there has been no identified change.

### **Senior executives and above**

Senior executives must comply with this policy as an employee and in addition must:

- fulfill their obligations in relation to the *Public Sector Commission Declarations of Interest Policy - Senior Executive Service and Equivalent Employees including Statutory Office Holders*.
- make a **new** assessment of any private and personal interests and whether they conflict, could be perceived to conflict, or have the potential to conflict with their official duties, as situations and circumstances change (**in addition to their annual and general declaration**).

- formally declare all conflicts of interest (including perceived and potential) and actively participate in any management plans with the relevant delegate, in accordance with the procedures of this policy.
- take no further action concerning a matter that is, or may be, affected by the conflict unless authorised by the relevant delegate.
- report reasonable suspected breaches of this policy in accordance with the *Code of Conduct for the Queensland Public Service*.

#### **Managers, executives and above**

In addition to the obligation to manage individual conflicts of interest reported by employees, they have an extra responsibility under this policy.

They have an obligation to act, such as make further enquiries with relevant employees, if they become aware of an issue that might give rise to a conflict of interest. This includes conflicts of interest that are suspected, or rumoured.

#### **Other types of managers such as operational leads and chairs**

Operational leads such as recruitment panel chairs, procurement panel chairs and committee chairs also have an obligation to ensure that conflicts of interest are raised, declared to the relevant delegate, and managed appropriately throughout the process they are conducting.

## **6 Breaches of this policy**

An employee's failure to avoid, wherever possible, or identify, declare and manage a conflict of interest in accordance with this policy could lead to disciplinary action including termination of employment.

In accordance with *HR Policy E9 - Requirements for reporting suspected corrupt conduct*, actions inconsistent with this policy may amount to a criminal offence, corrupt conduct, or an abuse of office, requiring the matter to be referred to an appropriate external agency (e.g., the Crime and Corruption Commission).

Queensland Health can impose sanctions on any external organisation or contractor who has not disclosed, managed or resolved a conflict of interest (e.g., the retrospective cancellation of affected tainted contracts, or exclusion of organisations from future contracting opportunities). Matters of corrupt activity regarding external organisations may also be referred to an appropriate external agency.

Any suspected breach of this policy or suspected corrupt conduct, must be reported in accordance with the *Code of Conduct for the Queensland Public Service* through relevant departmental or health service processes.

## 7 Record keeping

Formal records must be kept on a central register or similar, of all declarations, assessments, decisions made, and actions taken in relation to any disclosure or identification of a conflict of interest, as evidence that the conflict was appropriately declared and managed.

These public records are required to be handled and retained in accordance with relevant legislation, standards and policies.

## 8 Privacy

Reporting conflicts may involve disclosing personal information. Queensland Health is required to handle that information in accordance with the provisions of the *Information Privacy Act 2009*.

Records relating to conflicts of interest declarations may be subject to applications for access under the *Right to Information Act 2009* and/or the *Information Privacy Act 2009* with access determined by a delegate in accordance with the relevant legislation.

## Definitions

Term	Definition
Concurrent employment	An employee is in a concurrent employment arrangement when the employee has multiple positions (engagements) with Queensland Health at the same time and each engagement attracts a differing employment condition/entitlement. Refer to <i>HR Policy C47 – Aggregate and concurrent employment</i> for more information.
Employee	For the purposes of this policy, includes permanent, fixed term temporary and casual employees and anyone else paid, or unpaid, who works in any other capacity, for and on behalf of Queensland Health.
Interest	An interest is anything that can have an impact on the employee (holder of the interest) or a group. The impact can bring a benefit or disadvantage to the employee or others. Interests can be public or personal. There are two main types of interests – pecuniary and non-pecuniary – that can impact on either the public interest or a private/personal interest.
Gifts and benefits	<p>In accordance with <i>Directive 22/09 – Gifts and benefits</i>, the term <b>gifts and benefits</b> refers to items given or received in the course of official duties and includes tangible (of lasting value) and intangible (of no lasting value) items.</p> <p>Gifts and benefits include, but are not limited to:</p> <ul style="list-style-type: none"><li>• gifts of alcohol, clothes, products</li><li>• gifts of travel or accommodation</li><li>• preferential treatment such as queue jumping, use of facilities, hospitality or benefits generally</li><li>• food and drink received or given as part of a meeting, conference, trade display or other event attended as part of official duties</li></ul>

Term	Definition
	<ul style="list-style-type: none"> <li>• cap, pen, pencil, notepad, bottle of wine, bunch of flowers, box of chocolates</li> <li>• free use of facilities such as gyms, holiday homes or discounted travel</li> <li>• corporate offers of transportation, accommodation, tickets, meals and functions as part of a major event</li> <li>• awards or prizes including lucky door prizes or similar</li> <li>• tickets to the theatre, cultural events, sporting and other events or access to a private spectator box at a sporting or other venue</li> <li>• restaurant meals and beverages</li> <li>• sports team sponsorship</li> </ul>
Non-pecuniary interest	<p>A non-pecuniary interest does not have a financial component but may arise from personal or family relationships, involvement and activity in sporting, social, trade union, community or cultural activities. It does not include standard membership of a trade union.</p> <p>Non-pecuniary interests include any tendency toward favour or prejudice resulting from friendship, animosity or other personal involvement that could bias an employee's judgement or decisions.</p>
Operational lead	<p>For the purposes of this policy, the operational lead is outside of the employee's hierarchical relationship (i.e., not the line manager), and is the lead officer of the activity undertaken. Including, but not limited to the chair of a recruitment panel, the chair of a procurement panel, the chair of a committee).</p>
Other employment	<p>Additional paid employment (either on full time, part time or casual basis) performed by a Queensland Health employee, including absences on approved leave, to work:</p> <ul style="list-style-type: none"> <li>• in the Queensland public service, public sector or other government jurisdiction</li> <li>• in the private sector as an employee whether for a private company or business or ownership of, or directorship of a company, trading trust or partnership</li> <li>• as an independent contractor</li> <li>• in self-employment.</li> </ul> <p>Other employment does not include the ownership and investment in shares in a publicly listed company or investments in rental properties or other similar activities (unless, for example, the employee directly leases a property to Queensland Health).</p> <p>Concurrent employment is where an employee occupies more than one role within Queensland Health. This may present wrongdoing and a conflict of interest if through role A the employee acquires confidential information that could be of personal interest to their work in role B.</p> <p>Secondary employment is where an employee works for Queensland Health but also undertakes part-time or casual work for another organisation. For example,</p>

Term	Definition
	<p>operating a business, providing paid consultancy services to another individual or organisation.</p> <p>Other employment includes unpaid work where there might be a conflict.</p>
Pecuniary interest	<p>A pecuniary interest involves an actual or potential financial gain or loss. It may result from the employee, or someone associated with them (e.g., family member) owning property, holding shares or a position in a company bidding for government work, accepting gifts or hospitality, or receiving an income from a second job. Money does not actually have to change hands for an interest to be pecuniary.</p>
Private/ personal interest	<p>Private or personal interests are those private, professional or business interests that can benefit or disadvantage others or employees as individuals. They also include the personal, professional or business interests of individuals or groups employees associate with, such as family members and friends.</p> <p>Private interests include a wide range of external activities including financial and economic interests, family or private businesses, relationships, clubs or interest groups, and involvement in other employment.</p>
Public interest	<p>The public interest refers to the collective interest of the entire community – not the sum of individual interests, nor the interest of a particular group.</p> <p>To make a decision in the interest of the public is to act on what the public perceives as fair and beneficial.</p>
Psychosocial hazard	<p>A hazard that arises from, or relates to, the design or management of work, a work environment, plant at a workplace or workplace interactions and behaviours and may cause psychological harm, whether or not the hazard may also cause physical harm.</p>
Queensland Health	<p>Queensland Health includes all divisions of the Department of Health and all Hospital and Health Services.</p>
Relevant officers/persons	<p>Could include:</p> <ul style="list-style-type: none"> <li>• an officer with cultural capability</li> <li>• a Crime and Corruption Commission Liaison Officer</li> <li>• designated management representative</li> <li>• Ethical Standards Unit officer</li> <li>• Integrity Unit officer</li> <li>• Public Interest Disclosure Officer</li> <li>• or similar.</li> </ul>

## History

Date	Policy changes
15 July 2024	<p>New policy created, applicable to Queensland Health, to replace <i>HR Guideline E1 – Conflicts of interest</i> (QH-GDL-113-1) created under <i>HR Policy E1 – Workplace conduct and ethics</i> (QH-POL-113).</p> <p>New policy introduced to improve understanding and awareness of identification, declaration, resolution and / or management of conflicts of interest in the favour of the public interest.</p> <p>Policy also includes principles regarding human rights, reframing the State's relationship with Aboriginal peoples and Torres Strait Islander peoples, managing the risk of psychosocial hazards in the workplace Code of Practice 2022 and employee obligations in accordance with the <i>Public Sector Act 2022</i>.</p>
November 2021	<p>Guideline (QH-GDL-113-1) amended to:</p> <ul style="list-style-type: none"><li>• update naming conventions and references.</li><li>• Update employee obligations consistent with the <i>Public Service Act 2008</i>.</li><li>• include new sections on delegate responsibilities and record keeping.</li></ul>
July 2020	<p>Guideline amended to:</p> <ul style="list-style-type: none"><li>• update naming conventions and references.</li><li>• amended as a result of changes to the <i>Hospital and Health Boards (Changes to Prescribed Services) Amendment Regulation 2019</i>.</li></ul>
April 2017	<p>New guideline introduced to support existing human resources policies.</p>

## Attachment 1 - Procedure

The procedure for appropriately handling conflicts of interest consists of four key steps: identify, declare, manage and monitor.

Refer to the Conflicts of interest guideline for a self-assessment checklist and scenarios of conflicts of interest, and wrongdoing.

<b>IDENTIFY</b>	Employee is to consider <b>the situation and the circumstances</b> of any private and personal interests and whether they conflict, could be perceived to conflict, or have the potential to conflict with their official duties.
	Employee is to consider if conflicts are pecuniary (financial) or non-pecuniary (non-financial).
	Employee is to discuss the conflict with their line manager and operational lead if required, or other relevant officer, if appropriate.
	Line manager or operational lead is to contact their local human resources or ethical standards/ integrity unit or other relevant officer for advice if required.
	Line manager or other relevant officer is to advise the employee to take no further action in relation to the declared conflict of interest until appropriately directed by the delegate.
<b>DECLARE</b>	<b>As soon as an actual, potential or perceived conflict of interest is identified, as soon as practicable, the employee must make a formal declaration through the prescribed Departmental or HHS process.</b> The disclosure must include their line manager or other relevant officer and operational lead (if an operational lead is relevant).
	The employee is to ensure the declaration is forwarded to the appropriate delegate to decide on how to manage the conflict. Consult the appropriate delegate from the Departmental or HHS HR Delegations Manual.
	Submit the conflict of interest declaration promptly following the department or HHS submission process.
<b>MANAGE</b>	The delegate will: <ol style="list-style-type: none"> <li>1. receive and review the declaration.</li> <li>2. assess the situation in conjunction with the local Human Resources Team/ Ethical Standards/ Integrity Unit (or equivalent), (line manager and operational lead if required).</li> <li>3. determine whether a conflict of interest exists (actual, potential, perceived).</li> <li>4. decide the appropriate management action, or combination thereof from the options below, or another appropriate option, required to address the situation in the public interest.</li> <li>5. notify the employee. The employee must work constructively with the delegate to put appropriate mitigation strategies in place.</li> <li>6. implement the management strategy selected as the most appropriate for the circumstances of the matter.</li> <li>7. formally record the arrangements for resolving and managing the conflict.</li> </ol>

	<b>8. ensure it can be demonstrated, if necessary, that a specific conflict has been appropriately and transparently identified and managed.</b>
<b>MONITOR</b>	<p>The employee and delegate (line manager and activity lead) will:</p> <ol style="list-style-type: none"> <li>1. monitor and review the original situation that gave rise to the declaration.</li> <li>2. review the initial determination and management strategy implemented, and actions taken.</li> <li>3. review perceptions held by others that the conflict of interest is having an improper influence on the matter.</li> <li>4. discuss any changes to the original situation that gave rise to the conflict of interest.</li> <li>5. reassess management decisions made about the continued management of the conflict of interest.</li> <li>6. make any relevant changes to the management strategy and actions taken.</li> <li>7. keep formal records of assessments and decisions made.</li> </ol>

## Six management options

<b>Register</b>	<p><b>Mandatory first step.</b></p> <p>The register is where the details of an actual, perceived or potential conflict of interest declaration are formally registered.</p> <p>The registration of a declaration does not in itself resolve the conflict.</p> <p>Additional measures to positively resolve or manage the conflict of interest need to be considered.</p> <p>All conflicts of interest are to be registered regardless of what additional management strategies are adopted.</p>
<b>Restrict</b>	Where restrictions are placed on the employee's involvement in the matter.
<b>Recruit</b>	Where a neutral third party is used to oversee part or all of the process that deals with the matter.
<b>Remove</b>	Where the employee is removed from involvement in the matter creating the conflict.
<b>Relinquish</b>	Where the employee relinquishes the private interest that is creating the conflict.
<b>Resign</b>	Where the employee resigns from their position with Queensland Health.