Declaring and Managing Conflicts of Interest

This policy outlines how the Independent Parliamentary Expenses Authority (IPEA) manages the declaration of conflicts of interest by employees and others engaged to work with IPEA.

As an employee or contractor working at IPEA, you are required to declare conflicts of interest. ²

Why do I need to declare conflicts of interest?

IPEA needs to be aware of financial or other private interests or relationships of employees which could, or could be seen to, influence their decisions or advice, so as to be best placed to manage any potential or actual conflicts as early as possible. Declaring your interests assists your managers with fulfilling their legal obligations as well.

Submitting a declaration of interests provides employees with the opportunity to consider whether their financial or personal interests might raise a real or perceived conflict with their official duties and enable them to mitigate the risk.

Declarations of interests help to protect the interests of the Commonwealth and contributes to maintaining the APS Values of impartiality and integrity.

What do IPEA staff need to do?

As a staff member, you should:

- Take steps to avoid your personal interests being in conflict with official duties;
- If at any time your interests may - or could be perceived to - influence you in your duties, advise your supervisor and agree strategies to manage the situation, and make or update your declaration; and
- Print the declaration and provide it to your supervisor or the relevant official (for example, the Chair of an Evaluation Committee or Recruitment Selection Panel).

SES staff should declare their interests when they commence in their position, regularly assess if their interests may - or could be perceived to - influence them in their duties, and review their declaration at least annually.

Reviewing and updating conflict of interest declarations

You should review, revise and resubmit your conflict of interest declaration whenever:

- there is a change in your responsibilities or in the issues or subjects on which you are required to make decisions or give advice; or
- there is a change in your personal circumstances, or that of your family, that could impact upon the decisions you are making or the advice you are giving.

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² Section 29, Public Governance, Performance and Accountability Act 2013
Section 15(7), Public Service Act 1999
What should a declaration include?

Your declaration must document any financial or other private interests that you may have that might conflict, or could be reasonably perceived to conflict, with your duties as an IPEA staff member. This includes interests held by members of your immediate family, including a spouse or de facto, dependent children, or other relatives who live with you. These interests may include sporting, social or cultural activities, family or other personal relationships, outside employment and volunteer work. You should also declare conflicts relevant to recruitment or procurement activities.

IPEA’s Senior HR Officer, or IPEA’s Corporate Counsel, can provide you with advice regarding conflicts of interest.

Custody of, and access to, declarations of material personal interests

The Senior HR Officer will keep copies of all declarations of interests.

In some circumstances, you may be required to provide a copy of your declaration to the chair of a procurement, recruitment or other activity. You may also need to provide a copy to your supervisor for purposes such as assessing the impact of outside employment or the acceptance of gifts. The chair or your supervisor will consult as needed in respect of the declarations, including with IPEA’s Corporate Counsel.

Managing conflicts

Where a potential or actual conflict of interest is identified in relation to your duties and your declared interests, the conflict will be managed in consultation with you. In some circumstances, you may be required to remove yourself from meetings, projects or selection panels. You may also be given other duties, on a temporary or permanent basis, in order to manage actual or perceived conflicts of interest.

Conflicts of interest and security clearances

The Australian Government’s security vetting process may require staff to provide information on their personal financial and other interests that could make them vulnerable to external pressure. The purpose of the security vetting process is to identify personal circumstances or relationships that could make a staff member vulnerable to improper influence or otherwise compromise a staff member’s integrity or ability to manage sensitive information.

Changes to your personal situation, for example, marital status, living arrangements and finances, may affect your security clearance and should be notified to IPEA’s Security Officer and the Australian Government Security Vetting Agency (AGSVA).

Submitting a conflict of interest declaration

You can submit a conflict of interest declaration by filling out the attached form and submitting it to IPEA’s Senior HR Officer.

Where can I get more information about declaring and managing conflicts of interest in the APS?
Declaration of Interests Form

IPEA staff members must:

- take reasonable steps to avoid any conflict of interest, real or apparent, in connection with their work at IPEA; and
- declare details of any material personal interest of the employee in connection with their work at IPEA.

To be “material” a personal interest needs to be of a type that can give rise to a real or apparent conflict of interest. If you are unsure if you need to declare something, it is best to declare it anyway.

### A. Declaration of material personal interests

Please provide information regarding any material personal interests that could influence, or could reasonably be seen to influence, the decisions you take or the advice you give.

<table>
<thead>
<tr>
<th>Signature</th>
<th>Date</th>
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<tbody>
<tr>
<td>Surname</td>
<td>First names</td>
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2 The types of interests and relationships that may need to be disclosed include real estate investments, shareholdings, trusts or nominee companies, company directorships or partnerships, involvement in self-managed superannuation funds, other significant sources of income, significant liabilities, private business, social or personal relationships that could or could be seen to impact upon your duties or responsibilities.
### B. Family member declarations

These declarations are to be completed by the immediate family member/s of the employee should circumstances arise in which an IPEA staff member considers that material personal interests of the family member/s could influence, or could reasonably be seen to influence, the decisions they take or the advice they give.

#### Declaration of consent – family member

I declare that:

I am aware that my information has been collected for the purpose of identifying material personal interests that could influence, or could be seen to influence, the decisions that the IPEA staff member covered by the policy takes or the advice he/she gives. I am aware of the Australian Privacy Principles set out in the Privacy Act 1988 which authorise the collection and the third parties to whom my personal information may be disclosed. I consent to the collection of my personal information by IPEA.

The following list of my material personal interests has been prepared on that basis.

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<th>Signature</th>
<th>Date</th>
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#### Declaration of material personal interests – family member

Please list any material personal interests\(^3\) you have that could influence, or could reasonably be seen to influence, the decisions that the IPEA staff member covered by the declaration policy takes or the advice he/she gives.

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<th>Signature</th>
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<td>Surname</td>
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\(^3\) The types of interests and relationships that may need to be disclosed include real estate investments, shareholdings, trusts or nominee companies, company directorships or partnerships, involvement in self-managed superannuation funds, other significant sources of income, significant liabilities, gifts, private business, employment, voluntary activities, social or personal relationships that could or could be seen to impact upon the duties or responsibilities of the staff member covered by the policy.
### C. Outside employment and volunteering

#### Outside employment

Please fill out this form if you undertake paid work outside of IPEA.

| IPEA employment status (please tick) |☐ Employed full-time  
☐ Employed part-time  
☐ Casual  
☐ Contractor |
|--------------------------------------|--------------------------------------------------|
| Type of non-IPEA employment (please tick) |☐ Self-employed/Family business  
☐ Employed in the public sector (e.g. APS or ACTPS)  
☐ Contracted to the public sector  
☐ Employed in or contracted to the private sector  
☐ Other (e.g. professional athlete) |

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<thead>
<tr>
<th>Name of non-IPEA employer</th>
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<tr>
<th>Non-IPEA Job Title and nature of work</th>
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<table>
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<tr>
<th>Number of hours per week with non-IPEA employer</th>
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#### Volunteering

Please fill out this form if you undertake any volunteer work.

Volunteer work is work done for the main purpose of benefitting someone else, such as a church, sporting club, school, charity or community organisation.

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<tr>
<th>Name of Organisation</th>
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<th>Role</th>
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<th>Number of hours per month</th>
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#### Declaration

I declare that any non-IPEA paid work and volunteer activities I undertake:

- will not conflict with, or otherwise impact on, my work at IPEA; and  
- will be performed outside of my working hours at IPEA; and  
- are in accordance with the APS Values and Code of Conduct.
D. Receipt of Gifts and Benefits

Please fill out this form if you or your family have received any gifts or benefits over the last 12 months. Gifts received in a purely personal capacity do not need to be declared.

IPEA staff are encouraged not to accept gifts or benefits they may be offered or given in the course of their work. Gifts could include souvenirs, stationery, bottles of wine and personal items. Benefits could include sponsored travel, meals, hospitality, accommodation or entertainment.

Gifts and benefits can be politely declined at the time they are offered, or sent back to the giver afterwards.

Sometimes, it may not be appropriate for a gift or benefit to be declined, such as when refusal could cause cultural offence, where something of token value is offered by way of public thanks, or when attendance at an event is important in order to develop and maintain relationships with key IPEA stakeholders. In such circumstances, you should declare the gift or benefit.

Declaration

I declare that I received the following gift(s) or benefit(s):

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<th>What is the gift or benefit?</th>
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<th>How much is the gift or benefit worth?</th>
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<tr>
<th>What is your or IPEA’s relationship with the gift-giver?</th>
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<tr>
<th>What did you do with the gift?</th>
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