



SANDRINGHAM EAST PRIMARY SCHOOL

Conflict of Interest Policy

Rationale:

To avoid real or perceived conflict of interest by any SEPS staff, member of school council or any parent in a position of responsibility when acting on behalf of SEPS.

Aims:

- To define “Conflict of Interest” in a school setting.
- To explain DET regulations and guidelines in relation to “Conflict of Interest”.
- Establish clear policy guidelines applicable to SEPS to avoid any perceived or actual conflict of interest.

Implementation:

- The following is an extract of the key aspects of the definition of “Conflict of Interest” as provided by the DET:

<http://www.education.vic.gov.au/hrweb/workm/Pages/Conflict-of-Interest.aspx>

“COI arises in circumstances where an employee’s public duty is influenced, or can be seen to be influenced, by a private interest.

Private interests include both financial and non-financial interests, and can include the interests of family members and close friends or associates. They can be positive or negative interests—personal enmity towards someone can be just as relevant as loyalty to them.

The public duty of all employees of the Department (both in the Teaching Service and the VPS) and employees of school councils includes the obligation to perform all duties in accordance with public sector values, which include accountability, integrity and impartiality. A conflict therefore arises if a private interest might undermine an employee’s ability to perform a particular role in accordance with these values, whether or not the outcome of the task or function is affected; an employee’s benevolent intention does not mean that risks of perceived COI can go unaddressed.

While COI can lead to corruption and fraud, it mostly arises innocently and independently of any fraudulent intent and should be managed with this in mind—with transparency, consistency and without favouritism or exception.

COI can be actual, potential or perceived. A potential COI refers to circumstances where it is foreseeable that a COI may arise in future and steps can be taken now to mitigate any risk. A perceived COI arises where a reasonable person might think that an employee could be unduly influenced by a private interest, even if the employee is confident of their own objectivity.”

- DET has some regulations and guidelines that address “Conflict of Interest” that need to be included in the SEPS policy. Some key points are listed, but full details of regulations, guidelines and management is available on the DET web site: <http://www.education.vic.gov.au/hrweb/workm/Pages/Conflict-of-Interest.aspx>

Responsible management of COI in the Department is based on the following four principles:

- *Protecting the public interest through upholding public sector values*
 - *Supporting transparency and accountability*
 - *Promoting individual responsibility for integrity and impartiality*
 - *Developing an organisational culture which encourages effective management of COI.*
- Individual SEPS staff members, council members and parents in positions of responsibility need to be proactive in recognising any situation for themselves or colleagues which may be perceived to be a conflict of interest. In such a situation, the individual(s) concerned should either remove themselves from the decision making process or ensure that other people are included in the decision making process.
 - The decision making process should be clearly documented to be available in the event that any future ‘conflict of interest’ concern is raised. The relevant documentation will be included with the existing documentation relating to the situation concerned (eg: contract, incursion event, employment file etc).
 - The Principal is required, and has completed, for DET a “Declaration of private interests form” for each calendar year.
 - It should be noted that people are still encouraged to recommend friends, family and other people they know for any needs within the school. The process simply needs to be, and be seen as transparent.

Evaluation

- This policy will be reviewed as part of the school’s three year review cycle.

This policy was ratified by School Council – November 2016