

# DECLARATION OF INTEREST PROCEDURE (DLI)

## Section 1 - Preamble

- (1) This Procedure is effective from 1<sup>st</sup> of December 2025.

## Section 2 - Purpose

- (2) This Procedure sets out the process by which DLI identifies, manages, and resolves conflicts of interest (COI) to ensure transparency, integrity, and accountability in all activities and decisions.

## Section 3 - Scope

- (3) This Procedure applies to all University members and associates and includes the controlled entities.
- (4) During the establishment of DLI, all policy, procedures and supporting processes will be regularly reviewed. In the establishment phase, defined as the first two years from when students commence DLI programs, any issues arising from the implementation of current policy, procedure or process will be referred to a jointly-convened Policy and Procedure Review Panel (PPRP). The PPRP will comprise designated academic and professional service representatives from the University Partners and the Office of the Rector. The PPRP will recommend an outcome best aligned with relevant principles and the best interests of any student(s) concerned, and will advise DLI on the future development of policy, procedure and supporting processes. During the establishment phase, the PPRP may make recommendations to vary any given policy only with endorsement from relevant University Partner governance processes. All policy and procedure will be subject to a full review at the end of the two-year establishment phase.

## Section 4 - Policy

- (5) This Procedure is pursuant to the Integrity policy.
- (6) The University is committed to the highest standards of integrity in undertaking its core activities of teaching, research and community engagement, and ensuring that decision-making is free of undue influences, interests or relationships that conflict with, or give rise to, the potential for or perception of:
- a COI
  - corrupt or improper conduct
  - foreign influence
  - foreign interference.
- (7) A COI can be:
- actual: involves a direct or real conflict between an individual's duties and responsibilities to the University and a competing interest or obligation, whether personal or involving a third party.

- b. potential: arises where an individual has an interest or obligation, whether personal or involving a third party, that has the capacity to develop into conflict with their duties and responsibilities to the University;
  - c. perceived: exists where it could reasonably be perceived, or give the appearance, that a competing interest could improperly influence the individual's duties and responsibilities to the University.
- (8) Members of the University and associates have a responsibility to:
- a. avoid a COI;
  - b. identify and declare any personal or external interests, associations or affiliations including possible influences or potential for foreign influence or foreign interference, that may unduly affect the integrity and proper conduct of the University (a 'Disclosable Interest'); and
  - c. comply with any direction given by the University required to be taken in order to avoid or manage a COI (whether actual, potential or perceived) to the University's reasonable satisfaction, including to provide information and documents.
- (9) A COI that cannot be managed within the University's risk appetite may be considered unacceptable by the University. The University retains the discretion to not approve a COI, which may impact on the capacity of an individual to perform and continue their role as an officer, staff member, student, researcher or associate of the University, as the case may be.
- (10) The University will provide resources and training including compliance modules and advice to support members of the University to fulfil their obligations under this Procedure.
- (11) Persons subject to this Procedure may seek advice from their leader, budget centre head, relevant committee chair or meeting secretary, research manager, Research Integrity Advisers, contract manager, or the Legal team. Further guidance is available in the staff intranet under Disclosures and Declarations of Interest.

### **What is a Disclosable Interest?**

- (12) A Disclosable Interest is an interest that may impact upon an individual's duties and responsibilities to the University and their ability to impartially undertake and perform their role, and must be disclosed to the University. Disclosable Interests may arise or exist through:
- a. personal relationships,
  - b. affiliations or associations,
  - c. voluntary or remunerated activities including external employment, outside work and consultancies,
  - d. financial interests,
  - e. company director obligations, or
  - f. any other relevant interest or activity.

## **Section 5 - Procedure**

### **Identification and Declaration**

- (13) Staff and associates must proactively identify and declare any actual, potential, or perceived conflicts of interest that could affect or appear to affect their duties.

(14) Declarations must be made:

- a. Upon employment commencement or taking on a new role.
- b. When new conflicts of interest arise.
- c. Annually during the standard reporting cycle.

(15) Declarations must be submitted using the DLI Declaration of Interest Form.

### **Submission and Review**

(16) Completed declarations must be submitted to the staff member's direct supervisor or the Chair of the relevant governance committee for review.

(17) Supervisors and Chairs must assess the declarations and determine appropriate management strategies.

### **Management of Declared Interests**

(18) Management strategies may include:

- a. Recording the declared interest without further action if minimal risk is determined.
- b. Restricting involvement in relevant activities or decisions.
- c. Requiring the individual to recuse themselves from decision-making or discussion on certain issues.

(19) Management strategies must be documented and communicated clearly to the individual declaring the interest.

### **Register and Records**

(20) All declared interests must be recorded in a confidential Declaration of Interest Register maintained by the University.

(21) Records will be retained according to DLI's Information and Records Management policy.

### **Monitoring and Compliance**

(22) Supervisors and committee chairs are responsible for ongoing monitoring of compliance with declared management strategies.

(23) The University conducts annual audits of the register and management practices to ensure procedural compliance.

### **Breaches and Disciplinary Actions**

(24) Failure to comply with declaration requirements or management strategies may result in disciplinary actions according to relevant DLI disciplinary policies and procedures.

## **Section 6 - Definitions**

(25) For the purpose of this procedure:

- a. **Associate:** Contractors, consultants, volunteers, visiting appointees and visitors to the University.
- b. **Conflict of interest (COI):** exists when a University member or associate allows a personal interest, including any duty owed to another person, employer, affiliate or entity, including a foreign entity, to come into actual, potential or perceived conflict with the duty they owe to

the University. This includes but is not limited to a situation where the staff member, associate, or anyone with a personal relationship with the staff member is in a position to benefit personally, directly or indirectly, as a result of the conflict.

- c. **External employment:** work undertaken by a staff member for a person or organisation other than the University, for which the staff member receives payment, recompense or other consideration from the person or other organisation, and includes being a director or an external organisation(whether remunerated or not).
- d. **Financial interest:** a monetary gain, includes but is not limited to:
  - i. direct payment (such as salary, consultancy payments, speaking fees, panel memberships)
  - ii. indirect payment (funding for travel, accommodation, professional development, hospitality)
  - iii. payments to support research, such as funding from an industry or interest group
  - iv. company shares or options
  - v. royalties
  - vi. directorships
  - vii. some scholarships
  - viii. operational or infrastructure support
- e. **Personal relationship:** means immediate family and includes any person known to the staff member by reason or relations of similar status to marriage, sexual relationships, civil partners, business or financial relationships.
- f. **Member of the University:** means members of Council, staff including academic or professional staff, officers, executive or Honoraries appointed by the University as well as students.
- g. **University Body:** University Council, the Academic Board, Executive, Faculty Boards, Institute Boards and their committees, and such other bodies, committees and working parties as the University may from time to time establish.

## ASSOCIATED DOCUMENTS

(26) Associated documents are available on the [DLI Policy page](#):

PROCEDURE DETAIL	
<b>Name of procedure</b>	Declaration of Interest Procedure
<b>Overarching policy</b>	Integrity Policy
<b>Approved by</b>	Yayasan Governing Board
<b>Approval date</b>	27 <sup>th</sup> November 2025
<b>Date of effect</b>	1st December 2025
<b>Date of review</b>	1st December 2026

<b>DLI Approval</b>	Joint Management Committee 25 <sup>th</sup> November 2025
<b>Responsible Executive</b>	DLI Rector
<b>Implementation Officer</b>	DLI Chief Operating Officer
<b>Policy or procedure superseded</b>	N/A
<b>Associated documents</b>	Integrity Policy
<b>Summary</b>	This Procedure sets out the process by which DLI identifies, manages, and resolves conflicts of interest (COI) to ensure transparency, integrity, and accountability in all activities and decisions.
<b>Key words for online searching</b>	Conflict, Association, Interest, Affiliation, Declare, Special, Integrity
<b>Category</b>	Administrative or University governance
<b>Target audience</b>	Students, staff, associates