

## Conflicts of Interest policy

### Policy objective

A conflict of interest refers to a situation where an individual will have two competing interests – public duty versus private interests. Conflicts of interest must be disclosed to ensure transparency and accountability within the Public Sector.

All government employees are required to take reasonable steps to avoid conflicts of interest. This document provides DTF's policy on dealing with conflicts of interest that may arise during the course of an employee's duties.

### Scope

This policy applies to:

- All employees from DTF; and
- All representatives (including contractors, consultants and suppliers) carrying out processes or activities on behalf of DTF.

### What is a conflict of interest?

A conflict of interest is a situation where a personal or pecuniary interest has the potential to unfairly affect or influence public duties. A conflict of interest can also exist due to outside work activities (paid or unpaid) or a conflict of duty (e.g. membership of another public or private organisation).

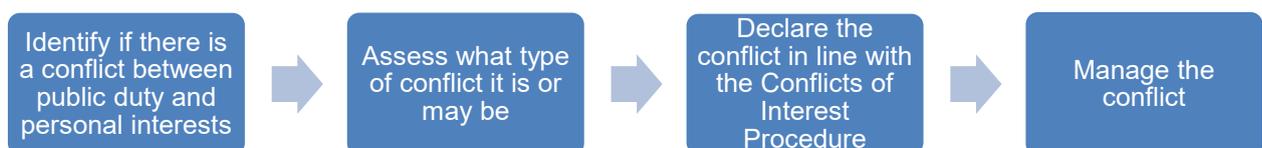
There are three types of conflicts (actual, potential or perceived) that involve either personal and/or pecuniary interests.

### Why a conflict of interest should be declared

Public sector employees are expected to operate with proper stewardship of public resources.

Conflicts of interest are a common phenomenon. By declaring a conflict, you are showing a preparedness to address the issue and will not be seen to be at fault or to blame. If a conflict is not declared and managed appropriately, it can undermine the integrity of the public sector. It can also be seen as misconduct.

### Policy detail



- All DTF employees and representatives must identify, assess, declare and manage conflicts of interest that may arise during the course of their duties. Conflicts of interest must be declared and managed at the earliest opportunity.
- Governing bodies such as DTF Boards and Committees must have conflicts of interest set as a standing item on their Agenda. A standing record of DTF Risk and Performance Committee members' other memberships and pecuniary interests must be maintained by the Risk, Audit and Security team and updated as required.

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- Staff nominated through risk management processes must disclose related party transactions.
- Outside employment or unpaid activities must be approved by a Manager or Branch Head.
- Conflicts of interest must be considered in all aspects of procurement and contract management processes.

### Responsibilities

Conflicts of interest are managed through a three lines of defence model.

1st line of defence: Branches	2nd line of defence: Risk, Audit & Security Team	3rd line of defence: Internal Audit
<p>Involvement in day-to-day conflict management activities, including: identifying, assessing, declaring and managing conflicts.</p> <p>If your DTF branch has conflict policies and procedures, please consult these.</p> <p>The Commercial and Economics Branch (CEB) and SafeWork SA (SWSA) have their own conflict of interest policy, for example.</p>	<p>Provides the DTF-wide conflict of interest policy, procedures and guidelines.</p> <p>Oversees conflict of interest issues and provides advice to the branches.</p> <p>Oversight and review of conflicts management.</p> <p>Sends an annual conflict of interest email reminder to DTF employees and representatives.</p>	<p>May provide independent review of the 1st and 2nd lines of defence with respect to conflict of interest.</p>

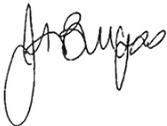
### Leaving the public sector

If you leave the South Australian Public Sector to work in another sector, you must avoid situations that would result in an unfair advantage for your new employer. This is especially the case where the employer is bidding for a government contract, competing for a grant or some other disbursement of public monies.

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## Related documents

- [DTF Conflicts of Interest Procedure](#)
- [DTF Conflicts of Interest Guidelines](#)
- [DTF Conflicts of Interest Online Declaration Form](#)
- [Accounting Standard AASB 124 Related Party Disclosures](#)
- [Code of Ethics for the South Australian Public Sector.](#)
- Commercial and Economics Branch (CEB): Conflict of interest protocol and supporting documents. Please refer to CEB Team Site.
- SafeWork South Australia (SWSA): Conflict of interest policy and procedure. Please refer to SWSA Team Site.
- [Independent Commissioner Against Corruption Act 2012 \(SA\).](#)
- [Public Corporations Act 1993 \(SA\).](#)
- [Public Finance and Audit Act 1987 \(SA\).](#)
- [Public Sector Act 2009 \(SA\).](#)
- [Public Sector \(Honesty and Accountability\) Act 1995 \(SA\).](#)



**Julie-Anne Burgess**

EXECUTIVE DIRECTOR, ORGANISATION AND GOVERNANCE

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