

Conflict of Interest Policy



1. Purpose

The purpose of this policy is to ensure all VEG Education (VEG) employees, contractors, and project partners identify, disclose, and appropriately manage any actual, potential, or perceived conflicts of interest. This safeguards the integrity of the RTO, maintains public trust, and meets the compliance requirements of the Standards for RTOs 2025.

2. Policy Statement

VEG Education is committed to ethical practice, transparency, and sound governance. It provides a framework to identify, disclose, and manage conflicts of interest to prevent fraud, corruption, actual or perceived bias, and to support compliance with the RTO Standards and associated legislative requirements. The mere existence of a conflict is not inherently a policy breach, but non-disclosure or unmanaged conflicts are considered serious risk and compliance issues.

3. Definitions

A conflict of interest occurs when a person's private interests (financial or non-financial) may improperly influence, or appear to influence, their professional duties at VEG.

This may involve:

- Family, friends, or associates (actual, potential, or perceived interests),
- Personal gain/loss or detriment/advantage for others,
- Situations involving recruitment, procurement, assessment, student support, asset disposal, and acceptance of gifts or benefits.

Types include:

- **Actual:** A real conflict between duties and private interests.
 - **Potential:** Where circumstances reasonably foresee a conflict could arise in future.
 - **Perceived:** Where it could appear to a reasonable person that private interests may improperly influence official duties.
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4. Scope and Coverage

This policy applies to:

- Directors, CEO, General Managers, and all those in leadership roles,
- Staff with financial, administrative, or student-facing responsibilities,
- Contractors, project partners, and their employees.

It supplements statutory, contractual, and other policy-driven obligations individuals have in relation to conflicts of interest.

5. Common Scenarios

- **Other Employment/Activities:** All secondary employment or relevant external activities must be disclosed in writing to the CEO prior to commencement.
 - **Procurement & Asset Disposal:** Declare relationships that could compromise procurement fairness, or benefit from disposal of organisational assets.
 - **Gifts & Benefits:** Only token gifts (nominal value under \$100) may be accepted; all offers above this threshold must be declared and guidance sought. Bribes, offers of money, or gifts from parties in procurement/contracting are strictly prohibited.
 - **Recruitment:** No involvement in appointment decisions where there is any existing or previous personal/professional relationship; the employee must recuse themselves and disclose the relationship.
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6. Disclosure and Management

- **Obligation:** All personnel have a continuous responsibility to identify, declare, and assist to manage conflicts of interest.
- **Disclosure:** Employees must complete a Conflict of Interest Declaration form and notify the CEO immediately if a conflict is identified, including relevant details. In cases involving the CEO, disclosure is escalated to the Board or most senior executive.
- **Assessment:** The CEO (or independent executive) assesses the risk and, where appropriate, documents and implements a conflict management plan using key strategies:

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- Record and Disclose: All relevant information is documented and shared with appropriate stakeholders.
- Restrict: Limit the person's involvement in the affected process or decision.
- Recruit/Monitor: Appoint a non-conflicted third party to oversee the matter.
- Remove: Individual proactively steps back from any decision or involvement in the matter.
- Relinquish: Employee relinquishes the private interest, if possible.
- Conflict management plans are regularly reviewed to ensure ongoing effectiveness.

7. Consequences of Non-Compliance

Failure to disclose or manage a conflict of interest can lead to disciplinary action or termination. All obligations extend to related policies and codes of conduct, including those covering secondary employment, student relationships, and child safety.

8. Staff Checklist

- Complete relevant declaration forms for conflicts of interest or gifts/benefits.
- Discuss declared interests with the CEO and follow agreed management plan.
- Monitor and update disclosures as circumstances change.

9. Monitoring, Reporting and Review

- All conflicts, declarations, and management plans are securely recorded for audit and compliance purposes.
- Policy is reviewed annually (or sooner on material regulatory change) to maintain legislative and sector alignment.