

## 1. Purpose

The purpose of this policy is to affirm CAIT Hi-Ed's institutional commitment to integrity, transparency, and impartiality in governance and decision-making. The policy establishes a framework to identify, disclose, record, and manage actual, potential, or perceived conflicts of interest (CoI) at all levels of the institution's governance and operations.

- 1.1. The policy supports CAIT Hi-Ed's compliance with the Higher Education Standards Framework (Threshold Standards) 2021 (Standards 6.1 and 6.2), the Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act), and the Corporations Act 2001 (Cth). It reflects good practice principles adopted by Australian higher education institutions.
- 1.2. The policy ensures that all members of the Governing Board (GB), Academic Board (AB), and their subcommittees act in the best interests of the institution and that decisions are made independently and free from improper influence or personal gain.

## 2. Scope

- 2.1. This policy applies to all members of the CAIT Hi-Ed Governing Board, Academic Board, and their subcommittees, including the Finance, Audit and Risk Management Committee (FARM), the Course Advisory Committee (CAC), and the Learning and Teaching Committee (L&T).
- 2.2. It applies to executives, senior management, academic staff, external consultants, contractors, and advisors engaged by CAIT Hi-Ed in any governance or decision-making capacity.
- 2.3. The policy also applies to any individual or entity representing CAIT Hi-Ed in situations where a decision, recommendation, or action could be influenced by a conflict of interest.

## 3. Policy Statement

- 3.1. CAIT Hi-Ed is committed to maintaining public trust and institutional credibility by ensuring that all governance and academic decisions are made objectively and transparently. The institution recognises that conflicts of interest, if not properly managed, can compromise integrity, independence, and regulatory compliance.
- 3.2. Through structured disclosure, monitoring, and mitigation processes, CAIT Hi-Ed ensures that conflicts of interest are identified early, recorded accurately, and managed in a way that protects the institution's integrity and aligns with sector best practices.

## 4. Principles

- 4.1. Integrity and Accountability: All members of governance and academic bodies are required to act with integrity and in the best interests of CAIT Hi-Ed.
- 4.2. Transparency: All conflicts—actual, potential, or perceived—must be disclosed promptly and fully.
- 4.3. Independence: Decision-making processes must remain independent, and conflicted individuals must recuse themselves from relevant deliberations.
- 4.4. Documentation: All disclosures, recusals, and related actions must be recorded in the meeting minutes and entered into the Conflict of Interest Register.
- 4.5. Continuous Improvement: Regular review and training ensure ongoing compliance and awareness across all governance levels.

## 5. Procedure

### 5.1. Conflict Identification and Disclosure

- Upon appointment, all members must complete a Declaration of Interests Form. This declaration is updated annually or whenever a new conflict arises.
- A standing agenda item titled 'Declaration of Interests' will be included in every meeting of the Governing Board, Academic Board, and subcommittees.
- Members must disclose any personal, financial, professional, or institutional interests that could influence or be perceived to influence their impartiality.
- All declared interests are to be recorded in the Conflict of Interest Register maintained by the Governance Officer.

## 5.2. Conflict of Interest Register

- The Governance Officer, on behalf of the Board Secretary, maintains the Conflict-of-Interest Register. The Register includes the following information:
  - Name and position of the individual
  - Nature of interest
  - Type of conflict (actual, potential, or perceived)
  - Date declared
  - Action taken or mitigation strategy
- The Register is reviewed annually by the Governance Committee and reported to the Governing Board and Academic Board for oversight.

## 5.3. Management and Mitigation Procedures

- Where a conflict is declared, the individual must recuse themselves from discussions and decision-making related to the matter.
- The Chair of the meeting ensures that conflicted members are absent during deliberations. The recusal and rationale must be recorded in the minutes.
- The Finance, Audit and Risk Management Committee provides independent oversight of related-party transactions and reviews them prior to Board ratification.
- The roles of the CEO and Board Chair are to remain separate. The CEO must not chair the Governing Board or any subcommittee.
- External advisors may be engaged for independent governance or remuneration reviews when conflicts involve senior executives or Board members.

## 5.4. Training and Awareness

- All members of the Governing Board, Academic Board, and subcommittees must participate in annual conflict of interest training. Training will also form part of the induction program for all new members.
- Members are required to acknowledge their understanding of and commitment to this policy annually.

## 5.5. Monitoring, Review, and Continuous Improvement

- The Governance Committee monitors compliance with this policy and reviews its effectiveness annually. Audit findings, TEQSA feedback, and independent governance reviews will inform policy updates.

- The Governance Officer is responsible for ensuring accurate recordkeeping, regular review of the Conflict-of-Interest Register, and timely reporting to the Governing Board.

## 6. Roles and Responsibilities

### 6.1 Governing Board

- Provides ultimate oversight of conflict management and approves the policy.

### 6.2 Chairs of the Governance, Academic Board and Subcommittees

- Ensures declarations are made, recusals are enacted, and actions are properly documented.

### 6.3 Manager, Corporate Support and Governance Services (CSGS)

- Maintains the Conflict of Interest Register and ensures compliance with reporting obligations.

### 6.4 Governance and Academic Boards and Subcommittees

- Disclose conflicts in relation to course development, academic decisions, or institutional partnerships.

### 6.5 CEO and Executives

- Ensure operational adherence and transparency in all institutional dealings.

## 7. Authority and Compliance

<b>File Number</b>	HEP111
<b>Status</b>	Current
<b>Approval Authority</b>	Governing Board
<b>Legislative Compliance</b>	<ul style="list-style-type: none"> <li>• Tertiary Education Quality and Standards Agency Act 2011 (Cth)</li> <li>• Higher Education Standards Framework (Threshold Standards) 2021</li> <li>• Corporations Act 2001 (Cth)</li> <li>• Education Services for Overseas Students Act 2000 (Cth)</li> <li>• National Code of Practice for Providers of Education and Training to Overseas Students 2018</li> <li>• Privacy Act 1988 (Cth)</li> <li>• Public Interest Disclosure Act 2013 (Cth)</li> <li>• Fair Work Act 2009 (Cth)</li> <li>• Crimes Act 1914 (Cth)</li> <li>• Fraud and Corruption Control Framework (Australian Standard AS 8001:2021)</li> </ul>
<b>Supporting Documents</b>	<ul style="list-style-type: none"> <li>• CAIT Hi-Ed Conflict of Interest Register</li> <li>• CAIT Hi-Ed Conflict of Interest Declaration Form</li> </ul>
<b>Related Documents</b>	<ul style="list-style-type: none"> <li>• CAIT Hi-Ed Governance Charter</li> <li>• CAIT Hi-Ed Academic Board Charter</li> <li>• CAIT Hi-Ed Finance, Audit, and Risk Management Committee ToR</li> <li>• CAIT Hi-Ed Course Advisory Committee ToR</li> <li>• CAIT Hi-Ed Learning and Teaching Committee ToR</li> <li>• CAIT Hi-Ed Privacy Policy and Procedure</li> </ul>

	<ul style="list-style-type: none"> <li>• CAIT Hi-Ed Risk Management Policy and Procedure</li> <li>• CAIT Hi-Ed Academic Quality and Integrity Policy and Procedure</li> <li>• CAIT Hi-Ed Compliance Management Policy and Procedure</li> <li>• CAIT Hi-Ed Fraud and Corruption Management Policy and Procedure</li> </ul>
<b>Higher Education Standards Framework (Threshold Standards) 2021</b>	<ul style="list-style-type: none"> <li>• Standard 6.1; ss 1 – 5</li> <li>• Standard 6.2; ss 1 - 3</li> <li>• Standard 5.2; ss 1 – 2</li> <li>• Standard 7.2; ss 1</li> </ul>
<b>Education Services for Overseas Students (ESOS Act) and National Code of Practice for Providers of Education and Training to Overseas Students 2018</b>	<ul style="list-style-type: none"> <li>• Standard 6.1</li> <li>• Standard 6.2</li> <li>• Standard 7.1</li> <li>• Standard 8.1</li> <li>• Standard 8.2</li> <li>• Standard 10.1</li> <li>• Standard 10.3</li> <li>• Standard 11.1</li> </ul>
<b>Responsible Officer</b>	Manager, CSCS.
<b>Responsible Executive</b>	CEO.
<b>Enquiries Contact</b>	Manager, CSCS.
<b>Effective Date</b>	
<b>Expiry Date</b>	Not applicable
<b>Next Review</b>	3 Years from the effective date

## 8 Review Schedule

This policy will be reviewed by the Governing Board every three years.

Version History			
Version No	Approved by	Approval Date	Revision Notes
1.0	Governing Board	28/11/2025	