



Policy Document Administrator	Vice-Chancellor vc@aut.edu.au (02) 9262 7890
Policy Document Approver	The Council
Responsible Body/Person	The Council
Next Review date	13 November 2026
Superseded documents	None
Related documents	<i>AUT Constitution, Code of Conduct, Conflict of Interests Procedure, Staff employment contracts (where relevant), Corporate Governance Policy, Whistleblower Policy</i>
Related HE Standards	6.1, 6.2
Related National Code Standards	

1. PURPOSE

To:

- (a) protect the integrity of the decision-making processes of the **AUT** by avoiding ethical, legal, financial or other conflict of interests;
- (b) set out the requirements with which all **Relevant Persons** must comply in order to avoid actual, potential or perceived conflict of interests;
- (c) provide guidance for dealing with any **conflicts of interests** in an open and transparent way;
- (d) give all stakeholders confidence in the AUT's decision-making processes; and
- (e) protect the integrity and reputation of the Relevant Persons and the AUT.

2. DEFINITIONS

Definitions for any words in **Bold** in this document can be found in the [Policy Glossary](#). The first instance of each defined term has been outlined in bold.

The following definitions apply for the purpose of this Policy:

Relevant Persons, for the purposes of this Policy, comprise the AUT Council, Committees of the Council, other officers of the AUT, members of other AUT boards, committees and panels, etc., employees (including contractors), consultants and volunteers of the AUT.

3. SCOPE

This Policy applies to all **Relevant Persons**.

4. POLICY STATEMENT

The AUT promotes, through the Code of Conduct and other policies, an environment based on Christian values, founded on the principles of honesty, responsibility, fairness and accountability, to maintain the integrity of its decision-making processes.

In order to sustain and enhance the integrity and reputation of the AUT and maintain the confidence of all stakeholders, the decision-making processes in the AUT must be free of any conflicts of interests.

Relevant Persons must avoid conflict between the interests of the AUT and their duties to the AUT on the one hand, and their own financial interests and non-financial interests on the other hand.

It is incumbent on all Relevant Persons to disclose and manage conflicts of interests as they arise. When disclosed, the conflict of interests should be avoided or, where this is not possible, action must be taken to ensure that the conflict of interests is managed in a transparent and appropriate manner.

5. POLICY APPLICATION

5.1 Disclosure of conflicts of interests

- 5.1.1 Any Relevant Person who has a conflict of interests in a matter that is being considered, or is about to be considered, must disclose the nature of their conflict of interests as soon as possible after the relevant facts are known.
- 5.1.2 Disclosure of a conflict of interests should be made by the Relevant Person to the Vice-Chancellor, Chair of Board/Committee or other group convened in the AUT or other relevant person as soon as possible after the conflict is identified or perceived, preferably in writing [see Conflict of Interests Procedure], but if this is not possible, verbally with the disclosure formally noted (e.g., in the minutes of a meeting) and supplementary documentation prepared for storage with the minutes [see Conflict of Interests Procedure].
- 5.1.3 The Vice-Chancellor, Chair of Boards/Committees or other groups convened in the AUT and other responsible parties are responsible for ensuring that disclosed conflicts of interests are evaluated and properly managed.
- 5.1.4 Disclosure of conflicts of interests should be a formal item on the agendas for all Boards, Committees or other groups convened in the AUT as a prompt to the Chair.
- 5.1.5 If a conflict of interests cannot be avoided, the Vice-Chancellor, Chair of Boards/Committees or other groups convened in the AUT and other responsible parties and the Relevant Person who is one party to the conflict of interests must manage the conflict of interests in accordance with the Conflict of Interests Procedure.
- 5.1.6 If the Vice-Chancellor, Chair of Boards/Committees or other groups convened in the AUT, or other responsible party becomes aware of an undisclosed actual or perceived conflict of interests, s/he should discuss the matter with the Relevant Person and manage the conflict of interests in accordance with the Conflict of Interests Procedure.

- 5.1.7 The AUT will maintain, for at least 7 years, records of conflicts of interests identified in relation to the AUT and actions taken in accordance with this policy.

5.2 Disclosure by AUT Staff

- 5.2.1 Officers, employees (including contractors), consultants and volunteers shall advise the Vice-Chancellor (Company Secretary) of any conflict of interests as soon as practicable after it is recognised.

5.3 Disclosure by Directors

- 5.3.1 A Director must disclose to the other Directors any conflict of interests they have in a matter that relates to the affairs of the AUT.
- 5.3.2 Directors must disclose conflict of interests as soon as practicable after becoming aware of their conflict of interests or need to make a disclosure. The disclosure will be reported in the minutes of the Council meetings and supplementary documentation prepared for storage with the minutes [see Conflict of Interests Procedure].

5.4 Standing Notices of Interests of Directors

- 5.4.1 Each new Director shall complete a Standing Notice about Interests which shall be tabled at a meeting of Council soon after commencement as a Director. Such interests include:
- (a) current employment and directorships;
 - (b) any previous employment with an entity in which the Director still has a financial or other interest where the entity may have a relationship with the AUT or an Affiliated College;
 - (c) any appointments (voluntary or otherwise) – e.g., trusteeships, tribunals, panels, enquiries which may have a relationship to the AUT or an Affiliated College;
 - (d) professional, organisational or other memberships which may have a relationship to the AUT or an Affiliated College;
 - (e) gifts or hospitality offered to the Director by external bodies and whether this was accepted or declined (see Code of Conduct Policy);
 - (f) family connections where relevant; and
 - (g) any contractual or other relationship between the Director and an Affiliated College or a theological college external to the Affiliated Colleges of the AUT.

Such interests do not necessarily result in a conflict of interests and are recorded in Standing Notices about Interests for transparency.

- 5.4.2 The Company Secretary shall maintain a Standing Notice about Interests for

each Director and shall provide copies to each new Director on commencement.

- 5.4.3 Whenever there is any change in interests notifiable under a Director's Standing Notice, the Director shall disclose the change as soon as practicable and an updated Standing Notice shall be tabled at the next Council meeting, the tabling recorded in the minutes of that meeting and the documentation stored with the minutes.
- 5.4.4 The Director who has completed a Standing Notice must ensure that the nature and extent of the interest(s) disclosed is/are recorded in the minutes of the meeting at which the Standing Notice is tabled.
- 5.4.5 The Company Secretary shall include the content of Standing Notices in the Conflict of Interests Register for transparency even if such content does not result in a conflict of interests.

5.5 Annual declaration of Conflict of Interests Register

- 5.5.1 The Company Secretary shall maintain a Conflict of Interests Register for the Company.
- 5.5.2 The Company Secretary shall ask Directors to review and update their Standing Notice of Interests prior to the first meeting of the Council in each calendar year so that the updated Notice may be tabled at that meeting.

5.6 Consequences for Breach of the Conflict of Interests Policy

- 5.6.1 An instance when a Relevant Person fails to disclose a conflict of interests may lead to an allegation of misconduct. Some breaches may result in additional legal proceedings being taken by the AUT.
- 5.6.2 Sanctions will be determined in accordance with the circumstances in question and may include counselling, use of disciplinary procedures, civil action or reporting of actions to relevant authorities that may result in the laying of criminal charges.
- 5.6.3 Victimisation of an individual as a result of disclosure of an actual or potential perceived conflict of interests is not permitted and may lead to an allegation of misconduct.

6. QUALITY ASSURANCE

Identify explicit mechanisms for measuring the effectiveness of the organisation in achieving the objectives of this policy.

7. RELATED DOCUMENTS AND LEGISLATION

[Australian Charities and Not-for-profits Commission Act 2012](#)

[Competition and Consumer Act 2010](#)

[Corporations Act 2001](#)

[Criminal Code Act 1995](#)

[Higher Education Standards Framework \(Threshold Standards\) 2021](#)

8. REFERENCES

[ACNC Governance Standards](#)

[TEQSA Guidance Note: Corporate Governance](#)

9. VERSION HISTORY

Version	Approved by	Approval Date	Effective Date	Changes made
1	Board of Directors	1 August 2008	1 August 2008	New Policy
2	Board of Directors	8 December 2014	8 December 2014	Updated
3	Board of Directors	13 November 2023	13 November 2023	Updated, separated procedures from policy, adopt current template
4	Vice-Chancellor	April 2025	April 2025	Update to new document template; minor editorial updates to implement University status.

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