

# Interests (Conflicts of Interest) Policy



THE UNIVERSITY OF  
**WAIKATO**  
*Te Whare Wānanga o Waikato*

**Responsibility for policy:** Health and Safety, Risk and Assurance Committee

**Approving authority:** Council

**Last reviewed:** August 2023

**Next review date:** October 2023

## Application

1. This policy applies to all staff of the University of Waikato as well as non-staff members of the University of Waikato Council and its committees.

## Purpose

2. The purpose of this policy is to:
  - a. require that those making decisions on behalf of the University disclose and manage any interests they may have, and act in a manner consistent with their responsibilities to the University and the public, and
  - b. require that staff working with other staff or students with whom they have a close personal relationship disclose and manage any interests they may have, and act in a manner consistent with the Staff Code of Conduct.

## Related documents

3. The following documents set out further information relevant to this policy:
  - [Appointment and Employment of Relatives or Close Friends of Staff Members Policy](#)
  - [Conflict of Interest FAQ](#)
  - [Financial Ethics Policy](#)
  - [Fraud and Corruption Policy](#)
  - [Governance and Management Guidelines](#)
  - [Managing Conflicts of Interest: Guidance for Public Entities \(Office of the Auditor General\)](#)
  - [Procurement Policy](#)
  - [Protected Disclosures Policy](#)
  - [Rules of Procedure for Council and its Committees](#)
  - [Staff Code of Conduct](#)

## Definitions

4. In this policy:

**close personal relationship** means a relationship that goes beyond a casual acquaintance or a teaching, supervisory, pastoral care or collegial relationship, including but not limited to:

  - a relative or close family friend
  - a relationship of financial dependence
  - a shared domestic living arrangement
  - a consensual romantic or sexual relationship.

**interest** means involvement in or attention given to a particular situation or relationship

**conflict of interest** means an interest that a person has that *actually* conflicts or *might* conflict or *might be perceived* to conflict with the interest of the University of Waikato. A conflict of interest can arise through a relationship, an activity or strong personal views and does not necessarily imply wrong-doing on the part of any person;

**staff** means a general or academic member of staff of the University of Waikato or a contractor to the University.

## Principles

5. The University encourages staff to have diverse interests and contacts across local, national and international communities; collaborations between staff and outside bodies are, generally speaking, both in the public interest and beneficial to the University.
6. It is possible however, that a staff member's interests could at times give rise to an actual, potential or perceived conflict of interest with their role and responsibilities at the University.
7. Potential conflicts of interest must be dealt with quickly and transparently, that is they must be:
  - disclosed
  - acknowledged
  - recorded
  - managed.
8. Ensuring that interests are properly managed is crucial to reducing legal and reputational risk and to demonstrating the integrity of individual staff and of the University; interests that are not properly managed have the potential to damage the reputation of individual staff and of the University as a whole.

## Identifying and managing potential conflicts of interest

9. The [Conflict of Interest FAQ](#) and the Office of the Auditor General Good Practice Guide [Managing Conflicts of Interest: Guidance for Public Entities](#) provide useful advice on identifying potential conflicts of interest.
10. The [Appointment and Employment of Relatives or Close Friends of Staff Members Policy](#) sets out the rules for managing potential conflicts of interest in relation to recruitment and employment matters.
11. The [Financial Ethics Policy](#) sets out the rules for managing potential conflicts of interest in relation to financial management.
12. The [Procurement Policy](#) sets out the rules for managing potential conflicts of interest in tendering and purchasing matters.
13. The [Staff Code of Conduct](#) sets out the rules for managing potential conflicts of interest in relation to close personal relationships.
14. Interests must be disclosed to the appropriate person in the circumstances; the appropriate person in most circumstances will be the staff member's line manager or supervisor, or in the case of committees, the chairperson.
15. Any person who has disclosed an interest in a matter being considered may, at the discretion of the line manager or committee chairperson, take part in discussion or decision on the matter giving rise to the interest.
16. Any person who has disclosed an interest in a matter and that interest has been determined by the line manager or committee chairperson to be in conflict with the interests of the University, must not take part in any decision about the matter.

## Responsibilities

17. Staff members must:
  - a. be seen at all times to behave in an impartial and transparent manner
  - b. identify and disclose any actual or potential conflict of interest that may affect, or may be seen to affect, their impartiality when acting on behalf of the University
  - c. be alert to situations in which the people that they manage or supervise may have a conflict of interest and ensure that the situation is recognised and handled appropriately.
18. Staff who have identified an interest - actual, potential or perceived - that may affect their impartiality when conducting business on behalf of the University must ensure that it is recorded in the University's Interest Register through [Kuhukuhu](#) (Financial Services: Interest Declaration).

**Confidentiality**

19. Disclosure of interests involving confidential or sensitive information must be handled with due regard to the privacy of the individual concerned.

**Responsibility for monitoring compliance**

20. The Director of Corporate Services and the Director of People and Capability are responsible for monitoring compliance with this policy and reporting any breaches to the Health and Safety, Risk and Assurance Committee.
21. Breaches of this policy may result in disciplinary action under the [Staff Code of Conduct](#).