



THE COUNCIL OF THE KING'S SCHOOL

CONFLICT OF INTEREST POLICY

DOCUMENT TITLE: Conflict of Interest Policy
DATE APPROVED: February 2017
REVIEW DATE: January 2022
RESPONSIBLE: School Executive

1. Purpose

1.1 One of the School's stated Values relates to integrity. Such a statement creates the expectation that the School will conduct its business and all its affairs with propriety, honesty and a commitment to uphold that which is right. In accord with that stated Value there is a need to ensure that government grants, parents' fees and distributions from Trust Funds that the School receives are all managed correctly and not to the personal benefit of an individual but for the School's purposes. The need to manage conflicts of interest at independent schools has become increasingly important following some high profile cases and amendment to legislation.

2. Policy Reporting Procedure

- 2.1 All Staff are required to avoid circumstances that may give rise to a perceived or actual conflict of interest. At the end of this document are questions you might ask yourself to determine if such a situation exists.
- 2.2 Should an actual or perceived conflict of interest arise then the staff member should advise the Clerk to the Council or their Senior Manager of the circumstances causing that conflict.
- 2.3 The staff member may be required to provide written details of the situation and also take certain actions to eliminate that conflict or put arrangements in place to satisfy the School's requirements that the potential conflict has been overcome through safeguards.

3. Register of Interest

- 3.1 The Clerk to the Council will maintain a confidential "Register of Interests" containing details of the relevant disclosures and any measures required to address the perceived or actual conflict.
- 3.2 This Register will be reviewed regularly by the Headmaster and Clerk to the Council. It will be laid open to the School Council on a regular basis. The Register may also need to be made available to the School's auditors and Inspectors from the New South Wales Education Standards Authority.

4. Checklist To Help Identify Conflicts of Interest

- 4.1 In assessing whether you have a conflict of interest it may be helpful to ask the following questions. The test when assessing the situation is to ask: "Could this conflict with my duties at the School?" If you answer YES to any of the questions below, you may have an actual, reasonably perceived or potential conflict of interest. (Source: ICAC¹)
- Would I or anyone associated with me benefit from or be detrimentally affected by my proposed decision or action?
 - Could there be benefits for me that could cast doubt on my objectivity?
 - Do I have a current or previous personal, professional or financial relationship or association of any significance with an interested party?
 - Would my reputation or that of a relative, friend or associate stand to be enhanced or damaged because of the proposed decision or action?
 - Do I or a relative, friend or associate of theirs stand to gain or lose financially in some covert or unexpected way?
 - Do I hold any personal or professional views or biases that may lead others to reasonably conclude that I am not an appropriate person to deal with the matter?
 - Have I contributed in a private capacity in any way to the matter my Department/the School is dealing with?
 - Have I made any promises or commitments in relation to the matter?

¹ ICAC Toolkit, *Managing Conflicts of Interest in the Public Sector*, 2004.



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- Have I received a benefit or hospitality from someone who stands to gain or lose from my proposed decision or action?
- Am I a member of an association, club or professional organisation or do I have particular ties and affiliations with organisations or individuals who stand to gain or lose by my proposed decision or action?
- Could this situation have an influence on any future employment opportunities outside my current School duties?
- Could there be any other benefits or factors that could cast doubts on my objectivity?

4.2 If the answer to any of the above questions is yes or if you still have any doubts about your proposed decision or action, you should seek direction from your Senior Manager or the Clerk to the Council.

February 2017

Version Table	
Version	Date
1.0	November 2016
2.0	February 2017
3.0	July 2020

