



Government of **Western Australia**  
Department of **Health**

# Managing Conflicts of Interest Guideline

Policy Frameworks  
Supporting Information  
MP 0138/20

February 2026

# Contents

1. Background.....	4
2. Conflicts of interest.....	5
2.1. What are conflicts of interest? .....	5
2.2. Key concepts .....	5
2.2.1. Personal interests.....	5
2.2.2. Public duty .....	7
2.2.3. Actual, perceived and potential conflicts of interest .....	7
3. Identifying conflicts of interest .....	8
3.1. The 6 Ps tool for identifying conflicts of interest .....	9
3.2. What do I do if I am still unsure if I have a conflict of interest .....	9
4. Declaring conflicts of interest .....	10
4.1. When and how to declare a conflict of interest .....	10
4.2. The role of your manager and approver in your conflict of interest declaration .....	10
5. Managing conflicts of interest.....	11
5.1. Assess the risks.....	11
5.2. Develop an appropriate management plan to mitigate the risks .....	12
5.3. Record the management plan .....	14
5.4. Obtain approval of the management plan.....	14
6. Reviewing conflicts of interest.....	15
7. Areas with a heightened risk of conflicts of interest .....	15
7.1. Identifying conflict of interest risks within work areas .....	15
7.2. Controls for business areas or functions with heightened risk of conflicts of interest .....	17
7.3. Conflicts of interest for staff members at risk of foreign interference .....	18
8. Conflicts of interest identified by management or third parties.....	19
9. Specific types of conflicts of interest .....	19
9.1. Conflicts of interest in recruitment .....	19
9.2. Conflicts of interest in procurement .....	20
9.3. Conflicts of interest in meetings.....	21
10. Guidance for managers.....	21
10.1. Promoting MP 0138/20 <i>Managing Conflicts of Interest Policy</i> .....	21
10.2. Supporting staff to identify, declare and manage conflicts of interests .....	22
10.3. Managing and reviewing conflict of interest management plans .....	22
10.4. Managers with a conflict of interest with their staff member .....	23
11. Guidance for approvers.....	23

12. Conflicting public duties .....	24
12.1. Multiple roles .....	24
12.2. Controls for conflicting public duties .....	25
13. Breaches of MP 0138/20 <i>Managing Conflicts of Interest Policy</i> .....	25
13.1. Reporting suspected breaches .....	25
13.2. Processes for dealing with breaches .....	25
14. Document control .....	26
Appendix 1: Conflicts of interest scenarios and management strategy options .....	27

# 1. Background

This *Managing Conflict of Interest Guideline* (guideline) supports the practical application of [MP 0138/20 \*Managing Conflict of Interest Policy\*](#) (the policy).

Integrity governance refers to the formal arrangements by which an organisation establishes, monitors and evaluates structures, instruments, systems and processes to promote a culture of integrity, and appropriately respond to issues.

When unmanaged, conflicts of interest can present a significant integrity risk to any public authority. As such, the management of conflicts of interest are a critical component of good integrity governance.

The policy and this guideline are a key component of the WA health system's integrity governance to address risks related to the management of conflicts of interest. The policy specifies the principles and minimum requirements with which WA health entities must comply to ensure a consistent approach to the management of risks associated with conflicts of interest. This guideline offers staff members practical guidance to identify, declare, and manage conflicts of interest, consistent with the policy.

This Guideline draws upon information contained within the Public Sector Commission's [Conflicts of Interest Guide](#).

## 2. Conflicts of interest

### 2.1. What are conflicts of interest?

A conflict of interest is a situation arising from a conflict between the performance of public duty and a personal interest.

Conflicts of interest may be actual, be perceived to exist, or potentially exist at some time in the future.

Staff members must ensure that their personal interests do not conflict, or appear to conflict, with their public duty. The policy requires that all actual, perceived or potential conflicts of interest are appropriately identified, declared and managed.

Conflicts of interest are not inherently wrong or unethical, and it is not always possible to avoid a conflict of interest, however it is important to ensure that conflicts of interest are dealt with appropriately and in a manner which protects the public confidence in the WA health system.

Staff members should be particularly attentive to situations which may involve a perceived conflict. The threshold for what could constitute a perceived conflict of interest can be low, however the potential for reputational damage to the WA health system as a result of perceptions of conflicts of interest can be significant.

When in doubt, it is best practice for staff members to declare and manage a conflict of interest, even if it does not appear significant. Conflicts of interest are usually more effectively managed if they are identified, declared and managed in a transparent manner as early as possible. This approach helps to protect the integrity of the organisation as well as the staff member involved.

### 2.2. Key concepts

#### 2.2.1. Personal interests

For the purpose of this policy, a personal interest refers to anything that has the potential to impact or influence a person or group of people.

A personal interest can be:

- a “direct interest”, where the conflict arises from a staff member’s personal interest; or
- an “indirect interest”, where the conflict arises from the personal interest of an individual or group that the staff member is associated with.

The term “personal interest” includes:

- the individual personal, professional or business interests of a staff member
- the personal, professional or business interests of individuals or groups that a staff member may associate with or have a relationship with
- a personal, professional or business interest of an individual or group that a staff member may have an unfavourable or acrimonious relationship with; and
- an ideological, political, religious or other personal belief or value held by a staff member.

Personal interest can generally be grouped into two categories – financial interests or partiality interests.

## Financial Interests

Financial interests (sometimes called pecuniary or material interests) relate to an interest which could result in a potential financial gain or loss to the public officer or someone associated with them.

Examples of financial interests include:

- financial investments (shares, cryptocurrency, self-managed superannuation)
- property ownership
- additional employment, including private practice
- business partnerships
- holding positions in external organisations (businesses, not-for-profit sector, small businesses)
- offers of gifts, benefits or hospitality.

Some examples of scenarios which might give rise to a conflict of interest related to a financial interest include:

- involvement in a procurement process which engages with an industry with which the public officer has a related financial interest
- an offer of a gift, benefit or hospitality by an organisation that has a business relationship with the relevant health entity
- a health practitioner undertaking additional employment in a private practice which provides services which could be used by patients of the WA health system.

The policy does not provide that all personal interests are disclosed, only that all actual, perceived or potential conflicts between personal interests and public duty are identified, declared and managed.

## Partiality Interests

Partiality interests (sometimes called non-financial or non-pecuniary or personal interests) relate to an interest that involves a public officer's relationships, obligations, personal involvements, values or attitudes, which could influence or be perceived to influence the way they carry out their official duties.

Examples of partiality interests include:

- family or personal relationships
- friendships
- adversarial or acrimonious relationships
- memberships or associations with clubs, groups, associations or other organisations
- volunteer commitments
- religious or cultural beliefs or obligations
- political or ideological beliefs or preferences
- other beliefs, values or attitudes.

Some examples of scenarios which might give rise to a conflict of interest related to a partiality interest include:

- managing a staff member who is a spouse or family member
- receiving a complaint from a member of the public about a co-worker who is a close personal friend
- being a panel member on a recruitment panel where an applicant is a former co-worker with whom the public officer has an acrimonious relationship.

### 2.2.2. Public duty

Staff member's "public duty", for the purpose of this guideline, refers to the duty of staff members to always put the public interest above their own personal interests while carrying out their official duties.

The "public interest" refers to the interests of the Western Australian community as a whole. The term public interest does not refer to the interests of multiple individuals, a particular group of people or a political party.

Identifying how to act in the public interest can sometimes be difficult, particularly when actions which may benefit one part of the Western Australian community could create a detriment or opportunity cost to another part of the community.

Practically, staff members can best fulfil their public duty to prioritise the public interest by:

- performing their prescribed duties fully and effectively
- acting in accordance with established integrity standards and requirements; and
- remaining cognisant of conflicts of interest and ensuring all actual, perceived or potential conflicts of interest are appropriately identified, disclosed and managed.

### 2.2.3. Actual, perceived and potential conflicts of interest

#### 2.2.3.1. Actual conflicts of interest

An "actual conflict of interest" occurs when there is a real conflict of interest between a staff member's public duties and personal interests.

When an actual conflict of interest occurs, a staff member's public duty may be, or be perceived to be, unduly influenced or impacted by their personal interest.

Examples of actual conflicts of interest may include:

- A health practitioner referring a patient to private health practice or service in which they or their family member have a financial interest.
- A friend or family member of a recruitment panel member applying for the position the process is related to.
- A staff member who works in hospital procurement obtaining additional employment with a business that supplies medical consumables.

#### 2.2.3.2. Perceived conflicts of interest

A "perceived conflict of interest" occurs when a member of the public or a third party could form the view that a staff member has a personal interest that could improperly influence their decisions or actions, now or in the future.

Examples of perceived conflicts of interest may include:

- A staff member who works in an area which receives requests for grant funding who was previously employed in a not-for-profit organisation which may request grant funding.
- A senior staff member (who is not involved in procuring or managing contracts) being invited to a significant sporting event by a close personal friend who is a senior executive at a professional services firm which has a contract with the WA health system.

- A registered health practitioner who prescribes medication is in a de facto relationship with a person who works in sales for a pharmaceutical company.

### 2.2.3.3. Potential conflicts of interest

A “potential conflict of interest” occurs when a staff member has personal interests that could conflict with their public duties. This refers to circumstances where it is foreseeable that a conflict may arise in the future and steps should be taken now to mitigate that future risk.

Examples of potential conflicts of interest may include:

- A staff member works in a team responsible for contract management. The staff member’s sibling recently started a new role at a company that is likely to bid for the contracts managed by the staff member’s team.
- A staff member has been invited by a former colleague to assist in a research project in their specialised field. This research project would likely seek grants or sponsorship from a range of sources, potentially the WA health system or universities with which WA health has financial relationships.
- A staff member is seeking to develop their career and broaden their skillsets and wishes to apply for a board position in a not-for-profit organisation with which they have a personal interest. The staff members current role does not provide any funding to the not-for-profit sector, however, does play a role in influencing high level policy and strategy related to their organisations relationship with the not-for-profit sector.

## 3. Identifying conflicts of interest

All staff members should remain vigilant to the possible risks of conflicts of interest in all their work. Identification of conflicts of interest can be challenging, as it is often difficult to see how your personal interest could relate to or be perceived to conflict with your public duty.

The primary responsibility for identifying a conflict of interest is on the staff member with the conflict. Particularly as they have the best knowledge and understanding of both their personal interest and its potential connection to their work.

The key question in determining whether a conflict of interest may exist is:

*“Are the circumstances such that a public officer could be influenced, or could appear to be influenced, by a personal interest in carrying out their public duty”.*

This test should be applied objectively, looking at the official role and the types of personal interests that exist from the perspective of a neutral observer.

In contemplating this question, the 6 Ps tool may be of assistance to identify some considerations which may be relevant to determining whether a conflict of interest may exist.

### 3.1. The 6 Ps tool for identifying conflicts of interest

While there is no one way to identify every situation which could give rise to a conflict of interest, the 6Ps tool is a starting point to apply to a particular circumstance to identify whether a conflict of interest may exist.

6 Ps	Questions to ask
<b>Public duty versus personal interest</b>	<ul style="list-style-type: none"><li>• Do I have a personal interest that may conflict or be seen to conflict with my public duty – roles and responsibilities – in this situation?</li><li>• What does my public duty require (for example, legislation, Code of Conduct, other policies or procedures, professional codes of ethics etc)?</li></ul>
<b>Potentialities</b>	<ul style="list-style-type: none"><li>• Could there be benefits for me or someone important to me now or in the future that could cast doubt on my impartiality?</li></ul>
<b>Perception</b>	<ul style="list-style-type: none"><li>• How will my involvement in the decision/action be viewed by others if they knew about my public duties and my interests?</li><li>• Would a neutral/reasonable person think these personal interests could conflict with my public duties?</li><li>• How damaging could perceptions be to me or my authority?</li></ul>
<b>Proportionality</b>	<ul style="list-style-type: none"><li>• Does my involvement in the decision appear fair and reasonable in all the circumstances?</li></ul>
<b>Presence of mind</b>	<ul style="list-style-type: none"><li>• If I ignore a conflict of interest, what are the consequences for me, others, my colleagues, the public and my authority?</li><li>• Would my involvement withstand public scrutiny?</li><li>• Who should I be discussing this with?</li></ul>
<b>Promises</b>	<ul style="list-style-type: none"><li>• Have I made any promises or commitments in relation to the matter?</li></ul>

[Adapted from: Public Sector Commission, *Conflicts of Interest Guide, the 6Ps and 6 Rs tools*, published 2 December 2023, available at: <https://www.wa.gov.au/government/multi-step-guides/conflicts-of-interest-guide/the-6ps-and-6rs-tools>]

### 3.2. What do I do if I am still unsure if I have a conflict of interest

Conflicts of interest may not always be easy to identify. Staff members should be encouraged to discuss any concerns with their manager or seek advice from their relevant Integrity area.

In discussing conflicts of interest, staff members should ensure that they are as transparent about their personal interests with their managers as possible, noting that it may on occasion be difficult for staff to discuss personal or financial matters. A transparent discussion is the most effective way to enable a situation to be considered to determine whether a conflict of interest exists and needs to be managed.

Managers are expected to treat all conversations regarding conflicts of interest sensitively and not share information about staff members personal interests without a clear managerial reason (eg obtaining approval for a conflict of interest management plan).

Generally, if after thorough consideration a staff member is still unsure if an issue constitutes a conflict of interest, it is most prudent to treat the matter as if it were a conflict of interest, declare it in the online Conflict of Interest Declaration Registry (COIR) and work with their manager and relevant approver to develop an appropriate management strategy.

## 4. Declaring conflicts of interest

### 4.1. When and how to declare a conflict of interest

The policy provides that all actual, perceived and potential conflicts of interest are to be declared in the COIR.

When a staff member identifies that they have a conflict of interest, they should declare their conflict of interest in the COIR as soon as reasonably practicable.

Detailed information about how to enter a declaration in the COIR can be found in the [Conflict of Interest Declaration Registry User Guide](#).

In declaring conflicts of interest in the COIR, staff members should ensure that the information provided is considered and sufficiently detailed to inform the authorised approver to appropriately consider the conflict of interest and proposed management plan.

The only circumstances in which a conflict of interest should not be declared in the COIR are when:

- the conflict of interest relates to a recruitment process, it is recorded in the recruitment documentation, and the conflict of interest is of such a nature that it is not likely to require ongoing active management and is unlikely to extend beyond the length of the recruitment process; or
- the conflict of interest arises in a meeting, is managed within the meeting and recorded in the minutes and is unlikely to extend beyond the length of the meeting.

### 4.2. The role of your manager and approver in your conflict of interest declaration

Each WA health entity is required to specify the authorised approver for conflicts of interest. In submitting a declaration, staff members are required to specify in the COIR the authorised approver. Once a declaration is submitted in the COIR, the authorised approver will be automatically notified of the declaration via the COIR.

If you are unable to identify your appropriate authorised approver, you should contact your relevant Integrity area for guidance.

Often authorised approvers may not be a staff member's immediate line manager. In such circumstances, it is generally appropriate for the staff member to discuss their conflict of interest and proposed management strategy with their manager to ensure that their manager is aware of the conflict and any intended actions to mitigate the conflict of interest. Managers are often in the best position to provide advice and input into proposed management strategies given their knowledge of their business units. Furthermore, managers are also practically most likely to be involved in the active management of a conflict of interest of their staff members. As such, engagement with managers during the declaration process is often a key step to the effective identification, declaration and management of a conflict of interest.

Conflicts of interest can be complex and challenging to identify, declare and manage. Where a staff member finds it difficult to articulate their conflict of interest in a declaration, or identify an appropriate management plan, they should seek the assistance of their line manager and/or their relevant Integrity team.

## 5. Managing conflicts of interest

### 5.1. Assess the risks

Conflicts of interest are a broad spectrum of interests which have the potential to range from being insignificant to extremely serious. As such, it is vital that all conflicts of interest are individually assessed to determine the associated risks which could arise out of the conflict of interest.

Assessing the risks associated with a conflict of interest includes identifying the potential risks a conflict of interest presents, assessing the likelihood of that risk eventuating, and considering the consequences of the risk eventuating.

Below is an example of how the risks of a conflict of interest might be assessed:

Example: Assessing the risk of a conflict of interest	
Scenario: A staff member has a role which sometimes involves the purchase of software and has personal friendship with a potential software supplier.	
Potential risks:	<ul style="list-style-type: none"><li>• The staff member may use their position to advantage the supplier because of their friendship.</li><li>• The staff member may (deliberately or inadvertently) provide information to their friend which could unfairly advantage the supplier.</li><li>• The staff member may not be cognisant of their bias towards the supplier in the decision-making process related to the purchase of software, resulting in an unfair advantage to the supplier.</li><li>• Competing software companies may have a perception of an unfair advantage being provided because of the friendship.</li></ul>
Likelihood of risk eventuating:	<ul style="list-style-type: none"><li>• A range of factors will influence the likelihood of the above risks eventuating, such as:<ul style="list-style-type: none"><li>○ The role of the staff member in purchasing.</li><li>○ The level of rigour in the purchasing process (eg who makes the decisions, the processes for considering suppliers (eg tender process, market scanning etc)).</li><li>○ The likely value of any software purchases.</li><li>○ The extent of the relationship between the staff member and potential supplier.</li><li>○ The level of competition within the market that supplies software which may be purchased.</li></ul></li></ul>
Potential consequences of the risk eventuating:	<ul style="list-style-type: none"><li>• The supplier obtains an unfair advantage (either through corrupt behaviour or an inadvertent failure to account for personal bias).</li><li>• A more suitable competitor supplier is unsuccessful, resulting in a poorer quality or more expensive product being purchased.</li><li>• The reputation of the staff member's organisation is damaged due to a perception of bias or preference.</li><li>• Suitable competitive suppliers do not bid for future purchasing processes, resulting in a poorer range of software options being available in the future.</li></ul>

## 5.2. Develop an appropriate management plan to mitigate the risks

Active management of conflicts of interest is required to ensure that the impact of risks of conflicts of interest are appropriately mitigated. An effective management plan should aim to resolve or minimise the impact of a conflict of interest, so that the actions and decisions of staff members are, and are perceived to be, honest, transparent, and impartial.

When a staff member identifies a conflict of interest, they are required to implement an appropriate management plan which must be approved by an authorised approver. Management strategies should be proportionate to the risks associated with conflict of interest.

The 6 Rs tool outlines a range of strategies which should be considered when developing a management plan for dealing with a conflict of interest. In some circumstances, merely recording a conflict of interest may be sufficient to address the risks if those risks are insignificant. In other circumstances, significant action may need to be taken where a conflict of interest is untenable, including staff divesting themselves of their personal interest or resigning from their position.

6 Rs	Description
<b>Record and/or Register</b>	<ul style="list-style-type: none"><li>• Record the disclosure of a conflict of interest in the COIR and/or some other manner.</li><li>• Exercise caution in determining whether this is a suitable management strategy or just the first step and other management strategies are required.</li><li>• Where significant risks are posed by a conflict of interest, recording/registering is the minimum requirement and is accompanied by another management strategy.</li></ul>
<b>Restrict</b>	<ul style="list-style-type: none"><li>• Restrict an officer's involvement in the matter to separate them from parts of the activity/issue that give rise to the conflict.</li><li>• This may mean refraining from being part of the debate, abstaining from voting on decisions, and/or limiting access to information relating to the conflict of interest.</li><li>• This strategy is useful for situations that occur infrequently and where it is possible to separate parts of the activity involved.</li></ul>
<b>Recruit</b>	<ul style="list-style-type: none"><li>• Recruit an independent third party to oversee part or all of the process or review the decision making process.</li><li>• This strategy is useful when it is not possible to restrict an officer's involvement as they are the only one available or only one with the required skills or knowledge, or the conflict is perceived rather than actual but the impact could be significant.</li><li>• The third party can fill in for the person or assist with the process and attest that it was above board and impartial. Getting the right third party is important as their credibility is what provides assurance to the public.</li><li>• This strategy is not realistic where the conflict is ongoing.</li></ul>

6 Rs	Description
<b>Remove</b>	<ul style="list-style-type: none"> <li>Remove involvement in the matter altogether. This could be the best option when ad hoc or recruitment strategies are not feasible or appropriate.</li> <li>This may be difficult to apply where a conflict is ongoing and impacts substantial parts of the role, as it can result in an officer not being able to carry out their role.</li> </ul>
<b>Relinquish</b>	<ul style="list-style-type: none"> <li>Relinquish personal interests that are creating the conflict.</li> <li>This strategy ensures there is no conflict with an officer's public duty. Examples include relinquishing shares or membership of a club/association.</li> <li>No one can or should be forced to give up a personal interest. It is up to the officer to decide whether their work commitments outweigh the attachment to the personal interest and to work with the authority to apply the appropriate management strategy.</li> </ul>
<b>Resign</b>	<ul style="list-style-type: none"> <li>Resigning may be the only strategy if the conflict of interest cannot be managed in any other way, particularly where conflicting personal interests cannot be relinquished and the conflict is ongoing.</li> </ul>

[Adapted from: Public Sector Commission, *Conflicts of Interest Guide, the 6Ps and 6 Rs tools*, published 2 December 2023, available at: <https://www.wa.gov.au/government/multi-step-guides/conflicts-of-interest-guide/the-6ps-and-6rs-tools>]

Staff members should engage with and seek support from their managers in the development of their management plan. This ensures that their understanding of the risks associated with the conflict of interest and appropriate strategies to mitigate that risk aligns with their managers. If the manager is not an appropriate person, the WA health entity's procedures should detail who should supervise management of the conflict of interest. Advice may also be sought from the relevant Integrity area. This may be required, for example, if an officer's manager also has conflict of interest related to the issue, or a staff member's conflict of interest is related to a project or process (eg recruitment, procurement) with which their manager is not directly involved.

A key component of conflict of interest management strategies is a designated review period. The policy requires that the management plan for any conflict of interest that is ongoing should be reviewed regularly, and at a minimum on an annual basis or when the circumstances of the conflict change. The review period should again be proportionate to the risk of the conflict of interest and consider the likelihood of changes in the circumstances of the staff member's personal interest or public duty. It may be appropriate to consider a shorter initial review period where the conflict is assessed as high risk, it is unclear how a management strategy might practically operate, or circumstances are likely to change.

### 5.3. Record the management plan

A key component in the development of an appropriate management plan is ensuring that the management plan is appropriately documented. As previously noted, the scale and scope of the management plan should be proportionate with the risks associated with the conflict of interest. In some circumstances a management plan may be relatively minimal, whereas in others it may need to be particularly detailed to account for specific risks.

At a minimum, a management plan should include:

- details of the conflict of interest (articulating the personal interest and how it conflicts with the public duty)
- key strategies identified to manage the conflict of interest
- for ongoing conflict of interest, the frequency and manner of review of the plan; and
- who is responsible for the strategies identified in the plan.

Management plans are required to be recorded in the COIR and submitted for approval. Where management plans are more complex, it may be appropriate that they are recorded in a more detailed format and a reference to where the record is stored should be provided in the COIR. Management plans must be recorded in a manner which is consistent with relevant recordkeeping requirements.

### 5.4. Obtain approval of the management plan

Conflict of interest declarations and management plans are approved via the COIR. When submitting a conflict of interest declaration and proposed management plan in the COIR, staff members are required to select their authorised approver. Once a declaration is submitted, the authorised approver is automatically notified via an email generated through the COIR.

Approvers are expected to consider declarations and proposed management plans and provide feedback or request changes as appropriate.

The policy requires that all authorised approvers:

- ensure that management plans appropriately mitigate against any risk arising out of the conflict of interest, and
- ensure declarations of conflicts of interest and proposed management plans are promptly and appropriately considered, approved and recorded in the COIR.

Once an approver has approved a declaration and management plan in the COIR, the staff member will be notified via an email generated through the COIR.

## 6. Reviewing conflicts of interest

The policy requires that management plans for all ongoing conflicts of interest are regularly reviewed, at a minimum on an annual basis or when the circumstances of the conflict of interest change.

A review of a conflict of interest management plan should consider the following:

- changes in circumstances related to the personal interest
- changes in circumstances related to the staff member's public duty
- changes in the type or level of risk associated with the conflict of interest
- the current strategies being used to manage the conflict of interest, and their effectiveness
- whether any additional strategies, or changes to current strategies, should be implemented to better mitigate the risk; and
- any other factors or circumstances which may warrant further discussion or consideration in relation to the conflict of interest or its management.

Reviews should be carried out in collaboration between staff members and their managers (where appropriate), and the outcomes of any reviews provided to the authorised approver. It is appropriate that approval is sought from the authorised approver if significant changes are proposed to the management plan.

A review of a conflict of interest may identify significant changes to the nature of a conflict of interest. Where the circumstances of the conflict of interest have fundamentally changed, resulting in a substantively different conflict of interest (eg additional personal interests identified, a substantively different work role for the staff member, circumstances occurring which turn a potential conflict of interest into an actual conflict of interest), it is appropriate that a new conflict of interest declaration and management plan are developed and submitted for approval.

In some circumstances, a review of a conflict of interest may determine that a conflict of interest no longer exists. In such circumstances, it would be appropriate to document the changes, seek the endorsement of the relevant approver, and note that the actions provided in the management plan are no longer required.

## 7. Areas with a heightened risk of conflicts of interest

### 7.1. Identifying conflict of interest risks within work areas

WA health entities undertake a broad range of functions and activities. While conflicts of interest can occur for any public officer, certain roles, functions or activities have a heightened risks for the occurrence of conflicts of interest.

Below are examples of functions or activities which may carry a heightened risks of conflicts of interest, along with examples of risks and the consequences which could eventuate if the risks are not appropriately managed.

Function	Conflict of interest risk	Potential consequences
Provision of healthcare or other services to members of the public.	Provision of services to members of the public with whom healthcare providers have a personal relationship.	Patients provided with unfair preferential treatment (in terms of quality of care or accelerated access to care).
Provision of healthcare or other services to vulnerable people.	Relationships develop that may influence decision making or enable healthcare providers to take advantage of vulnerable people.	<p>Patients provided with unfair preferential treatment (in terms of quality of care or accelerated access to care).</p> <p>Healthcare providers inappropriately using their position to take advantage of vulnerable people for a personal benefit.</p>
Distribution of funds or other benefits.	Preferential treatment or bias in the distribution of funds based on personal relationships or to obtain a benefit.	<p>Funds or benefits inappropriately directed away from one applicant to another.</p> <p>Corrupt use of position to obtain a benefit, at the detriment of applicants.</p>
Regulatory functions.	Bias in decision making as a result of personal relationships or interest.	<p>Inequitable decision making in the application of regulatory functions, providing a benefit to one organisation or person conducting the regulated activity.</p> <p>Corrupt use of position to obtain a benefit (for the staff member or the organisation or person conducting the regulated activity).</p>
Procurement and contract management.	Bias or preferential treatment in procurement or contract management as a result of personal interests (relationships or financial interests).	<p>Inequitable decision making in the procurement of goods or services, resulting in an unfair benefit to one vendor over another.</p> <p>Corrupt use of position to obtain a benefit (for the staff member or the vendor).</p>
Recruitment.	Bias in recruitment process due to personal relationships.	The best candidate for a position is not appointed.

Function	Conflict of interest risk	Potential consequences
Information management, particularly personal or sensitive information.	Inappropriate access, use or disclosure of information as a result of personal relationships.	<p>Personal or sensitive information is inappropriately accessed, used or disclosed. This may result in an unfair benefit or disadvantage for involved persons.</p> <p>Commercially valuable information is disclosed resulting in an unfair benefit for one person or organisation.</p> <p>Corrupt use of position to obtain a benefit or cause a detriment to an individual or organisation by inappropriate use or disclosure of information.</p>

Business areas which identify that their work, or functions or activities that they undertake, may give rise to a heightened level of risk as a result of a conflict of interest should consider conducting an assessment of that risk in accordance with [MP 0006/19 Risk Management Policy](#) (applicable to Health Service Providers), the Department of Health [Risk Management Policy](#) and/or any related local risk management policies and procedures.

## 7.2. Controls for business areas or functions with heightened risk of conflicts of interest

Upon identifying that a business area, or a particular function or activity of that business area, has a heightened risk of conflicts of interest, it may be appropriate to consider implementing controls to manage that risk.

Any such controls should be implemented in accordance with [MP 0006/19 Risk Management Policy](#) or the Department of Health [Risk Management Policy](#), [MP 0105/19 Fraud and Corruption Control Policy](#) and/or any related local risk management policies and procedures. Ultimately, the purpose of controls is to implement systems and processes that aim to mitigate the impact of the risk and decrease the likelihood and impact of the consequences of the risk occurring.

As with conflict of interest management plans, controls to address the heightened risk of conflicts of interest should be considered on a case-by-case basis and be proportionate to the risk and the circumstances of that business unit. In some scenarios appropriate controls may be relatively minimal, and in other higher risk areas controls may need to be significant to address the risk appropriately.

Examples of the types of controls a business unit may consider implementing to mitigate a heightened risk of a conflict of interest could include:

- Requiring certain staff to complete a register of personal and/or financial interests.
- Targeted education on the potential risks of conflicts of interest, tailored to the risks of the specific business area.

- Rotation of staff in key roles (eg ensuring the same staff do not repeatedly service the same accounts, customers, vendors etc).
- Additional layers of decision making, peer reviews of key decision processes, or other quality assurance processes.
- Regular opportunities to declare conflicts of interest (eg conflicts of interest as a standing agenda item in meetings, conflict of interest statements inbuilt into forms or processes).
- Financial or decision-making delegation.
- Requirements for external parties (eg contractors, vendors) to disclose any conflicts of interest.
- Local procedures or processes which address key conflict of interest risks (eg patient triage procedures, information management procedures).
- Regular audits of key systems and processes (eg financial audits for irregularities, systems audits for unauthorised access etc).
- Engagement of external parties where appropriate (eg external panel members in recruitment or procurement processes).
- Clear expectations provided to staff in relation to ethical behaviour and how to address conflicts of interest.

If you require assistance in identifying heightened risks of conflicts of interest or the appropriate controls to implement to address this risk, contact your relevant Integrity area or Risk Management team.

### 7.3. Conflicts of interest for staff members at risk of foreign interference

“Foreign interference” refers to activities which serve the strategic, political, military, social or economic goals of foreign governments, at the expense of Australia’s own interests. Foreign interference does not mean legitimate foreign influence conducted in an open and transparent manner (eg legitimate lobbying, advocacy and diplomatic activities). Foreign interference involves covert, deceptive, corrupting, coercive or threatening actions on behalf of, in collaboration with, or directed by a foreign government. This can include espionage or sabotage, but also more subtle forms of influence and coercion.

Certain staff members may have an elevated risk of being a target for foreign interference. Three main vectors of foreign interference (the pathway by which foreign interference is conducted) have been identified. These vectors are:

- Information – which can be stolen, manipulated or fabricated to achieve a purpose for a foreign actor.
- People – who can be corrupted, deceived or coerced to act for a foreign actor.
- Infrastructure – which can be accessed, controlled, misused to achieve a purpose for a foreign actor.

Certain positions in WA health may have functions that interact with these vectors, and therefore be at an elevated level of risk of foreign interference. Staff members who occupy these roles are expected to maintain a heightened level of awareness in relation to conflicts of

interest, particularly conflicts of interest which relate to foreign affiliations, foreign relationships and/or foreign financial interests.

Appropriate consideration of the risks associated with the threat of foreign interference should be undertaken when developing a management strategy for a conflict of interest which may have such a risk.

In the instance where staff members believe that there is an actual, perceived or potential conflict of interest with a foreign entity, the staff member should/must seek guidance from and report the matter to their relevant area responsible for the managing of foreign interference.

## 8. Conflicts of interest identified by management or third parties

In some circumstances, a conflict of interest may be identified by a person who is not a party to the conflict of interest. Managers in particular can be in a unique position to identify conflicts of interest which may not have been identified, declared or managed.

All staff member in management positions should endeavour to use their position to promote the policy, and ensure their staff are aware of their responsibilities in relation to conflicts of interest.

Where a concern is raised that a conflict of interest has not been appropriately identified, declared and managed, it should be reported in accordance with relevant local policies and processes.

If a staff member is unsure how to report suspected breaches of this policy, they should seek guidance from their relevant Integrity area, Human Resources area or their manager (if appropriate).

Relevant health entities should ensure that appropriate processes are in place to provide adequate guidance about the processes for conducting appropriate enquiries into concerns regarding undeclared conflicts of interest.

## 9. Specific types of conflicts of interest

### 9.1. Conflicts of interest in recruitment

All staff involved within recruitment processes are expected to comply with all requirements related to conflicts of interest in recruitment. This includes [MP033/16 Recruitment, Selection and Appointment Policy](#), in addition to local policies, procedures and forms which detail requirements and processes for disclosing conflicts of interest related to recruitment.

Generally, a conflict of interest related to a recruitment process is not required to be declared in the COIR. A conflict of interest related to a recruitment process must however be recorded in the COIR where:

- it requires “ongoing active management” to mitigate the risk; or
- it extends, or is likely to extend, beyond the length of the recruitment process.

A conflict of interest which requires “ongoing active management” refers to circumstances where a conflict of interest is generally significant but cannot be avoided (eg a conflict of interest exists, but no other suitable alternative recruitment panel members can practically be engaged as an alternative). In these scenarios, the management required for the conflict of interest would require scrutiny or assurance at multiple points throughout the recruitment process.

Any conflict of interest which extends beyond the length of the recruitment process or may have further implications beyond that process must also be appropriately identified, declared and managed (in the COIR), consistent with the policy. This includes, for example, where the successful appointment of an applicant creates an ongoing conflict of interest with a panel member.

Where a conflict of interest exists that is not captured within existing local policies, processes or procedures, it should be managed in accordance with the policy and declared in the COIR.

## 9.2. Conflicts of interest in procurement

Procurement, and procurement related activities (eg purchasing, disposal of goods, sponsorship, engagement of contracted medical practitioners, staff air travel etc) have the potential to present conflicts of interest with significant consequences if they are unmanaged.

Mandatory policies related to the governance and process requirements which must be applied in relation to procurement activities across the WA health system include:

- [MP 0079/18 Engagement of Medical Practitioners under Contracts for Services Policy](#)
- [MP 0005/16 Grants, Esoteric Arrangements and Sponsorships Policy](#)
- [MP 0161/21 Procurement and Contract Management Policy](#)
- [MP 0004/16 Procurement Development and Management System Policy](#)
- [MP 0017/16 WA Health Staff Air Travel Policy](#)

Various procurement related activities may have different or additional mechanisms or requirements for dealing with risks related to conflicts of interest.

All conflicts of interest (actual, perceived and potential) identified while undertaking procurement activity (covering the full procurement lifecycle including planning, the establishment of contracts, and contract management) are required to be identified, declared and managed in accordance with the policy (declared via the COIR) in addition to any other relevant processes, policies or other requirements.

It is noted that in some circumstances this may result in a duplication of declaration of conflicts of interest. However, the high-risk nature of procurement activities necessitates strict compliance with these requirements.

It is also noted that procurement processes often require declarations that a conflict of interest does or does not exist. Declarations that an individual does not have a conflict of interest are not to be recorded in the COIR. Only when a conflict of interest (actual, perceived or potential) is identified does the obligation to declare the conflict in the COIR arise.

### 9.3. Conflicts of interest in meetings

Where a conflict of interest is identified in relation to a staff member during the course of a meeting, the staff member is expected to verbally declare that they have a conflict of interest and articulate what the interest is. This declaration should be made either to the Chair of the meeting, or if the Chair is making the declaration, to the meeting.

An appropriate strategy for dealing with the conflict of interest should be implemented immediately. As with all management strategies, the strategy should be proportionate to the risks associated with conflict of interest. The 6 R's tool in section 5.2 outlines a range of strategies which may be appropriate.

If a conflict of interest is complex or it is not possible to quickly identify an appropriate management strategy, it may be appropriate to halt the meeting or defer any meeting actions related to the conflict of interest until such time that an appropriate management strategy can be identified.

The meeting Chair and the staff member with the conflict of interest are responsible to ensure that the conflict of interest, and strategy taken to manage the conflict of interest, are recorded in the meeting minutes.

If the conflict of interest identified extends, or is likely to extend, beyond the length of the meeting, the relevant staff member is required to declare the conflict of interest in the COIR and follow the usual process for the identification, declaration, and management of a conflict of interest as set out in the policy.

## 10. Guidance for managers

### 10.1. Promoting MP 0138/20 *Managing Conflicts of Interest Policy*

All staff members who are managers or supervisors have a responsibility under the policy to ensure that staff members under their management understand their obligations under the policy.

To meet this expectation, it is expected that managers should take appropriate proactive actions to promote the policy and guide staff in relation to its application. Ways in which managers can promote the policy might include:

- regular reminders (in person, in meetings or via written communication) about the expectations in relation to conflicts of interest
- building triggers for the consideration of conflicts of interest into existing processes or practices (eg regular item on meeting agendas, discussion point in performance management etc)
- advising staff members of instances where the manager themselves may have identified, declared and managed conflicts of interest
- implementing additional controls in relation to business areas or processes which have an elevated risk of conflicts of interest
- seeking opportunities for staff to obtain specific training in relation to conflicts of interest relevant to the business area.

Managers and supervisors should also be particularly cognisant of conflicts of interest in times of change. For example:

- ensuring new staff members are made aware of the expectations within the policy
- ensuring that as functions or activities change, that the risks of conflicts of interest within business areas are re-evaluated
- ensuring that when staff members who have conflicts of interest move business areas, that management plans are appropriately reviewed in the context of the new business area
- ensuring that when they vacate their role (eg moving positions, taking leave or leaving their employment), that the appropriate subsequent or acting manager is appropriately briefed or provided with handover notes related to ongoing conflicts of interest and details of their management plans.

## 10.2. Supporting staff to identify, declare and manage conflicts of interests

The policy provides that all managers or supervisors must assist the staff members under their management to appropriately identify, declare and manage their conflicts of interest. As such, it is incumbent on all managers and supervisors to ensure that they have sufficient understanding of the requirements related to the identification, declaration and management of conflicts of interest within the policy.

Supporting staff to comply with the policy could include a range of different behaviours, for example:

- raising the topic of conflicts of interest with staff members when you feel that a conflict of interest may exist or could be likely to occur
- providing support to staff members who have queries about conflicts of interest, and if required, directing them to the appropriate business areas (eg Integrity teams) or resources for advice or education
- discussing with staff members who have indicated that they may have a conflict of interest their obligations and the proposed action;
- assisting staff members to complete a declaration in the COIR, including appropriately identifying and articulating the conflict of interest
- providing input into the development of management plans for staff members.

## 10.3. Managing and reviewing conflict of interest management plans

Practically, managers and supervisors play a key role in ensuring that management plans are appropriately implemented. It is incumbent on managers and supervisors to ensure that they understand the terms of a staff member's conflict of interest management plan, so that they can guarantee that the plan is being appropriately adhered to.

All ongoing conflicts of interest management plans are required to specify a review period (at least annually or when the circumstances of the conflict of interest change). In certain circumstances, it may be appropriate for a manager or supervisor to commence a review process (or consideration of a review process), for example:

- when the designated period within the management plan has lapsed
- when the circumstances of the staff member's duties or work have changed
- when they become aware of any changes in the staff member's personal interest
- when it becomes apparent that the practical application of the conflict of interest management plan is ineffective to appropriately and proportionately mitigate the risks of the conflict of interest
- when it becomes apparent that the practical application of the conflict of interest management plan is unduly onerous, disproportionately so to the risks of the conflict of interest.

In conducting a review of the conflict of interest management plan, the manager should engage with the staff member with the conflict of interest, the authorised approver, and any other key personnel (eg other staff members within the reporting line, chair of a relevant process related to the conflict of interest, other staff who may be impacted by the management plan).

#### 10.4. Managers with a conflict of interest with their staff member

While generally, managers and supervisors have a responsibility to ensure support their staff to appropriately identify, declare, manage and review their conflicts of interest, there are some circumstances where this is not appropriate. Specifically, on some occasions a manager may have the same, or a similar or related conflict of interest as the identified staff member. In those circumstances, it is generally not appropriate for the manager to be involved in the process of managing staff who have a related conflict of interest.

Examples of situations where a manager might have the same, or a similar or related conflict of interest as a staff member could include:

- circumstances where the manager and staff member hold the same (or a joint) personal, philosophical or financial interest (eg both holding shares in the same corporation)
- similar personal religious or political beliefs
- having an ongoing close personal relationship with their staff member that extends beyond the workplace (eg a familial relationship, romantic relationship etc).

In such circumstances, managers who have a related conflict of interest to their staff member should seek guidance from their line manager and/or their relevant Integrity area about how to manage such a conflict of interest.

## 11. Guidance for approvers

WA health entities are required to identify the authorised persons within their entity who are required to make decisions regarding the conflict of interest and the agreed management plan.

Staff members who are designated as authorised persons (approvers) may often be managers and are expected to promote the policy and provide guidance to staff members as described above.

Upon the receipt of a conflict of interest declaration and proposed management plan, approvers are required to consider the declaration promptly and appropriately. In doing so, approvers

should ensure that they have sufficient information and knowledge to appropriately consider the circumstances of the conflict of interest, clearly understanding the staff member's personal interest and how it may interact with their public interest.

Where a declaration does not provide an approver with sufficient information to understand the conflict of interest or make an informed judgement on the suitability of the proposed management plan, the approver is required to take appropriate actions to suitably inform themselves. This may include:

- requesting changes to be made to the declaration
- seeking clarification or additional information (in person or in writing)
- discussing the conflict of interest declaration and proposed management action directly with the staff member and/or their line manager
- seeking further advice about the functions of the business area from the line manager or other appropriate officers; or
- seeking advice from the health entity's relevant Integrity area.

In determining whether to approve the identified management plan, it is incumbent on the approver to be satisfied that the plan appropriately mitigates against any risk arising out of the conflict of interest. Guidance about the consideration of risks arising out of conflicts of interest, and options of strategies to manage those risks are outlined above in this guideline.

Approvers should also be clear about the mechanisms through which the management plan will be complied with. For example, ensuring the relevant manager is aware of the proposed management plan and any responsibilities they may have in relation to the plan.

Approvers should also be clear about the mechanisms and triggers for the review of the management plan. Approvers may wish to consider that in certain circumstances (eg changes to the nature of the conflict of interest, changes in management of the staff member etc), it may be appropriate for the review process to require engagement or approval from the authorised approver.

## 12. Conflicting public duties

### 12.1. Multiple roles

While conflicts of interest occur when there is a conflict between a public duty and a personal interest, situations can arise where a person may have two competing public duties. This situation typically arises where a public officer holds multiple roles. For example, being a member of a public sector board or committee, working on inter-agency collaborative projects, aiding another public authority in a decision-making process (eg procurement, recruitment).

There are many reasons why officers may hold multiple roles within the WA public service, and ultimately these roles all carry a public duty to act in the public interest. However, when a staff member has more than one public role, it can become difficult to keep the two roles separate. In some scenarios, this can result in improper or poor decisions, or the inappropriate use of information for an improper purpose.

## 12.2. Controls for conflicting public duties

Appropriate controls should be established at the commencement of any additional public duties to ensure that any risks associated due to the connection or overlap between these two roles is appropriately mitigated.

Staff members who hold multiple roles need to have a clear understanding of each role, and both authorities involved also need to set clear expectations about the individuals' obligations to each authority.

Consideration should be given to clarifying which organisation or body the staff member is acting for. For example, are they in a position acting on behalf or as an advocate for the Department of Health or a Health Service Provider, or are they engaged in the additional role to act in the interests of a different organisation or body.

Generally, where there are conflicting public duties such circumstances should be dealt with in a similar way to conflicts of interest, with the competing duties identified, disclosed to an appropriate more senior officer, and a management strategy implemented to mitigate any risks. Many of the strategies used to manage conflicts of interest (discussed below) may also be of assistance in managing the risks associated with conflicting public duties.

Both the relevant staff members, in addition to the related agencies, need to remain cognisant of the potential for conflicts between these roles, the options for managing these conflicts, and how these conflicts may change over time.

## 13. Breaches of MP 0138/20 *Managing Conflicts of Interest Policy*

### 13.1. Reporting suspected breaches

Any staff member who has a reason to believe that a breach of the policy has occurred, should report the suspected breach in accordance with the relevant local policies and processes.

If a staff member is unsure how to report suspected breaches of policy, they should seek guidance from their relevant Integrity area, Human Resources area or their manager (if appropriate).

### 13.2. Processes for dealing with breaches

Processes related to breaches of the policy are outlined within the policy in 3.3. *Breaches*. Further information may be found in the following mandatory and Department policies (where relevant):

- [MP 0127/20 Discipline Policy](#)
- [Department of Health Discipline Policy](#)
- [MP 0083/18 Disputes About the Professional Conduct of a Contracted Medical Practitioner Engaged Under a Medical Services Agreement Policy](#)
- [MP 0125/19 Notifiable and Reportable Conduct Policy](#)

If you require additional information or clarification in relation to the processes for dealing with breaches of the policy, you may contact your relevant Integrity team.

# 14. Document control

Version	Approved by	Published date	Review date	Amendment(s)
1.0	Shane Giblett, A/Director System-Wide Integrity Services	2 February 2026	2 February 2029	Original version

## Appendix 1: Conflicts of interest scenarios and management strategy options

Below are a range of scenarios where a conflict of interest may potentially occur and some recommended strategies to address the conflict of interest.

Please note that these suggested strategies are provided as an example only and do not provide an exhaustive list of strategies which may be applied to every situation. Each individual conflict of interest should be assessed on its merits and considered in its relevant context as the relevant circumstances play a key role in determining the risk associated with a conflict of interest.

### Procurement and contract management

Personal relationships with suppliers	
<b>Scenario</b>	A staff member who works in procurement has a personal family relationship with a potential supplier.
<b>Strategy</b>	<p>Staff member to remove themselves from any purchasing or contract management process which may be likely to involve that potential supplier or their direct competition.</p> <p>If possible, the staff member should also remove themselves from discussions surrounding those processes.</p> <p>This conflict of interest must be declared in the COIR, and the management strategy approved by the appropriate authorised officer. Where the relevant procurement policies, procedures or processes has additional requirements related to conflicts of interest, these must also be followed.</p>

Financial interests with suppliers	
<b>Scenario</b>	A staff member who works in procurement has a financial interest with a potential supplier.
<b>Strategy</b>	<p>Staff member to remove themselves from any purchasing or contract management process which may be likely to involve that potential supplier or their direct competition.</p> <p>If possible, the staff member should also remove themselves from discussions surrounding those processes.</p> <p>If the role is such that the processes which may pertain to the potential supplier make up a large proportion of the staff member's work, it may be appropriate for the health entity to consider transferring the staff member to a different role.</p> <p>This conflict of interest must be declared in the COIR, and the management strategy approved by the appropriate authorised officer. Where the relevant procurement policies, procedures or processes has additional requirements related to conflicts of interest, these must also be followed.</p>

Gifts from suppliers	
<b>Scenario</b>	A supplier offers the staff member who manages the supplier's contract an end of year gift to thank them for their health entity's continued business.
<b>Strategy</b>	<p>This gift cannot be accepted in accordance with <a href="#">MP 0136/20 Gifts, Benefits and Hospitality Policy</a>, and should be declined at first offer. If possession of the gift is taken, it should be returned.</p> <p>The officer who received the offer is required to declare the gift in the Gift Declaration Registry.</p> <p>The officer should advise the supplier that it is in contravention of WA health system policy to accept gifts from suppliers, and request that they refrain from providing any future offers of gifts.</p> <p>Where the relevant procurement policies, procedures or processes have additional requirements related to conflicts of interest or the offer of gifts, these must also be followed.</p> <p>If there is any other conflict of interest between the supplier and staff member, this must also be declared in the COIR and an appropriate management strategy implemented as in accordance with the policy.</p>

## Recruitment

Conflict of interest as a recruitment panel member	
<b>Scenario</b>	A staff member is a member of a recruitment panel. An applicant to the panel is a close personal friend.
<b>Strategy</b>	<p>The staff member must comply with requirements within <a href="#">MP 033/16 Recruitment, Selection and Appointment Policy</a> and any local policies, procedures or processes regarding recruitment.</p> <p>Ideally, the staff member should withdraw from their role on the recruitment panel.</p> <p>Where this is not possible, a range of actions may be appropriate to mitigate the risk (depending on the circumstances of the matter) such as:</p> <ul style="list-style-type: none"> <li>the staff member not providing opinions on their friend's application or interview until all other panel members have first had the opportunity to do so;</li> <li>adding another independent panel member to the process; or</li> <li>segregating the assessments provided by the staff member, to be compared independently to the rest of the panel.</li> </ul> <p>If the conflict of interest continues beyond the length of the process (for example, if the friend was appointed to the position), the staff member would be required to complete a declaration in the COIR and implement an appropriate management strategy in accordance with the policy.</p>

Influencing recruitment processes	
<b>Scenario</b>	A person with whom a staff member has a familial relationship is an applicant to a recruitment process. The staff member is not a member of a recruitment panel but is in a position to influence a recruitment process (eg a manager or executive to whom a panel member report).
<b>Strategy</b>	<p>The staff member should remove themselves from any involvement with the recruitment process (even if that involvement is merely tangential) and not offer any advice of direction to any staff in relation to the process.</p> <p>This conflict of interest must be declared in the COIR, and the management strategy approved by the appropriate authorised officer.</p>

## Managing staff

Managing a staff member with whom there is a personal relationship	
<b>Scenario</b>	A manager has a close personal relationship with a staff member over whom they exercise a level of managerial control or oversight.
<b>Strategy</b>	<p>An appropriate management strategy should address all aspects of the way the manager exercises control over the staff member. This could include:</p> <ul style="list-style-type: none"> <li>• ensuring decisions regarding the staff members leave, hours, rostering are delegated to another appropriate officer;</li> <li>• a strong level of oversight over the allocation of work within the relevant team to ensure no preference is provided to the staff member;</li> <li>• performance management processes regarding the staff member run by another officer, or are conducted in consultation with other managerial staff;</li> <li>• recommendations regarding acting opportunities, incremental progression (or non-progression) are re-allocated to another appropriate managerial staff member; and/or</li> <li>• a requirement that any concerns regarding the influence of the relationship or unfair treatment be escalated to a more senior officer immediately.</li> </ul> <p>In some instances, such a conflict of interest can only be managed by the reallocation of the manager or staff member to a business unit where the impact of the conflict of interest is less significant.</p> <p>This conflict of interest must be declared in the COIR, and the management strategy approved by the appropriate authorised officer.</p>

## Additional employment

Employment of a staff member in an external organisation	
<b>Scenario</b>	A staff member undertakes additional employment with an external private business.
<b>Strategy</b>	<p>Staff members are required to obtain approval for any additional employment, which may be provided via the completion of the <a href="#">D18 Request to Engage in Additional Employment Form</a>.</p> <p>Any conflicts of interest as a result of the additional employment must be declared in the COIR, and the management strategy approved by the appropriate authorised officer.</p> <p>Strategies which may be appropriate for conflicts interest related to additional employment could include:</p> <ul style="list-style-type: none"> <li>• restricting involvement with particular activities, functions, processes or projects which have the potential to impact on, or be impacted by the external business;</li> <li>• restricting access to confidential information which could have commercial value;</li> <li>• requiring staff member to complete additional confidentiality forms, or declarations confirming that public resources (eg time, ICT equipment, medical consumables, stationary, printing etc) will only be used for the purposes of the health entity; and/or</li> <li>• requiring the staff member to provide regular updates to their manager (or other appropriate officer) of any changes to their private engagement (eg hours worked, key activities etc).</li> </ul> <p>Where an additional employment relates to the private practice of a clinician or health practitioner, the management strategy should extend to:</p> <ul style="list-style-type: none"> <li>• not promoting or advertising their private practice to WA health patients, clients, or staff; and</li> <li>• not using their position to refer WA health patients to their private practice.</li> </ul> <p>In some instances, it may be inappropriate for a public officer to undertake a proposed additional employment as the risks associated with the conflict of interest cannot be appropriately managed. In such circumstances, the only appropriate management strategy may be that approval to undertake additional employment is denied.</p>

## Personal relationships with patients or clients

Providing services or care to a client or patient with whom there is a personal relationship	
<b>Scenario</b>	A staff member who provides services or care to clients or patients through their role, providing those services or care to a client or patient with whom they have a personal relationship.
<b>Strategy</b>	<p>Where possible, it would be appropriate for staff members to arrange for services or care to be provided by a different staff member to avoid any perception of a conflict of interest.</p> <p>In scenarios where this is not possible, the staff member should ensure appropriate strategies are implemented to ensure no preferential treatment is provided.</p> <p>This conflict of interest must be declared in the COIR, and the management strategy approved by the appropriate authorised officer. In some circumstance (eg providing care in an Emergency Department) this may not be possible. In these instances, staff should ensure compliance with local policies, and also ensure that they immediately identify any potential conflicts of interest with their line manager.</p>

## Memberships of associations, clubs, political parties or other organisations

Decision-making processes related to associations, organisations etc	
<b>Scenario</b>	A staff member is involved in a decision-making process which has the potential to impact on a group (eg association, club, political party, other organisation) with which the staff member is associated with.
<b>Strategy</b>	<p>The staff member should remove themselves from decision-making process which may involve or impact on the group with which they are associated. If possible, the staff member should also remove themselves from discussions surrounding that process.</p> <p>Where the conflict of interest extends beyond a single decision-making process, the management strategy should also identify how the ongoing conflict of interest might be managed (eg removing access to sensitive information which may be of a financial benefit to the group). All management strategies implemented should be proportionate to the associated risk and the individual's level of involvement with the organisation.</p> <p>This conflict of interest must be declared in the COIR, and the management strategy approved by the appropriate authorised officer.</p>

## Intellectual Property and Research

Private work related to intellectual property or research	
<b>Scenario</b>	A staff member engaged in research and/or the development of intellectual property for their health entity, undertaking related work in their private capacity (eg publishing work, external research projects etc).
<b>Strategy</b>	<p>The staff member must ensure that the management plan clearly articulates the boundaries between work undertaken in their private and public capacity. This may include:</p> <ul style="list-style-type: none"> <li>• clearly articulating the scope of any private activities being undertaken, particularly if they are in a similar field to the staff member's private role;</li> <li>• ensuring WA health information, intellectual property, data, work time or other resources are only used for appropriate and approved WA health purposes;</li> <li>• ensuring the staff members role at with WA health is not used to promote any private work, research or publications;</li> <li>• ensuring the scope of research or related tasks is clearly delineated between staff member's private and public roles, including opportunities for the development of intellectual property or publication of research.</li> </ul> <p>This conflict of interest must be declared in the COIR, and the management strategy approved by the appropriate authorised officer.</p> <p>If the private work is paid, approval for additional employment via the <a href="#">D18 Request to Engage in Additional Employment Form</a> must be obtained.</p> <p>Any strategy should be ensure consistency with the requirements of <a href="#">MP 0156/21 Intellectual Property Policy</a>.</p>

**This document can be made available in alternative formats on request for a person with disability.**

© Department of Health 2026

Copyright to this material is vested in the State of Western Australia unless otherwise indicated. Apart from any fair dealing for the purposes of private study, research, criticism or review, as permitted under the provisions of the Copyright Act 1968, no part may be reproduced or re-used for any purposes whatsoever without written permission of the State of Western Australia.

[health.wa.gov.au](https://health.wa.gov.au)