

System Manager Conflicts of Interest Registry (COIR) User Guide

Introduction

The WA health system *Managing Conflicts of Interest Policy* (the Policy) requires all Department of Health employees and Health Service Provider staff members to declare and document all personal or professional actual, perceived or potential conflicts of interest.

Department of Health employees and Health Service Provider staff members are required to agree and document a management plan approved by the authorised persons in the WA health system entity for resolving or managing an identified conflict of interest.

This User Guide provides guidance to Department of Health employees and Health Service Provider staff members to register an actual, perceived or potential conflict of interest into the System Manager Conflicts of Interest Registry (COIR).

Conflicts of interest arise when a Department of Health employee or Health Service Provider staff member's official duty is directly affected or impacted by their personal or private interests. Actual, perceived and potential conflicts of interest are not inherently unethical or wrong however they must be declared and managed.

This User Guide is intended to provide guidance about the process of declaring a conflict of interest in the System Manager COIR. It is important that you familiarise yourself, and act in accordance with, the Policy. If you require further advice or assistance regarding the declaration or management of a conflict of interest, or use of the COIR, contact your relevant WA health system entity's Integrity area.

Accessing the System Manager COIR

The COIR may be accessed through the following link: <http://coi.hdwa.health.wa.gov.au> All Department of Health employees and Health Service Provider staff members can access the System Manager COIR. The log in details are the employee/staff member's HE number and their chosen password.

Department of Health employees and Health Service Provider staff members are reminded that all information recorded in the System Manager COIR constitutes a formal written record. You must ensure that all information provided is accurate and complete.

Registering a conflict of interest in System Manager COIR.

Step 1: Enter personal details.

Enter your name, HE number, position, location, employer and contact details in the fields shown below.

Conflict of Interest Form

Employee Details

HE Number	<input type="text"/>	<input type="button" value="Check"/>
First Name	<input type="text"/>	
Last Name	<input type="text"/>	
Position	<input type="text"/>	
Location	<input type="text"/>	
Telephone	<input type="text"/>	
Email	<input type="text"/>	
Health Services Provider	<input type="text" value="- Please select -"/>	

When entering details into the location field please ensure you specify the hospital or site and ward/department/unit level (e.g. *Radiology Department at Sir Charles Gairdner Hospital*).

Step 2: Provide details of the conflict of interest.

Complete the fields below, describing both the nature of the conflict of interest and describing the public duty in question. The examples below may provide some guidance in relation to completing these fields.

Conflict of Interest Details

Describe the nature of the matter or issue that is the subject of the possible conflict of interest:

Describe the public duty in question (eg involvement in tender process):

EXAMPLES:

Describe the nature of the matter or issue that is the subject of the possible conflict of interest:

“I am a procurement officer involved in assessing tenders for the engagement of counselling services within in a hospital. My partner sits on the board of a not-for-profit organisation which has submitted a tender for this project”.

Describe the public duty in question (e.g. involvement in tender process):

“I am responsible for providing an impartial assessment of each tender application, as part of a team, making recommendations as to whether each application meets the requirements of the tender, and assessing which application is preferred”.

Step 3: Answer all the questions related to the 6 P’s.

Provide an answer to each of the questions listed below:

Private Interest:	
Do I have personal or private interests that may conflict or be perceived to conflict with my public duty?	
<input type="text"/>	
Do I have any significant ties, obligations, financial relationships and/or affiliations with organisations, clubs, groups or individuals who stand to gain or lose from this matter?	Not Set ▼
Do I, or anyone associated with me, have a private business (or secondary employment) interest in this matter?	Not Set ▼
Do I have significant family or other relationships with clients, contractors or other people involved in the matter?	Not Set ▼
Does the matter relate to financial (pecuniary) interest as defined in legislation and regulations?	Not Set ▼
If there is a private interest, is it sufficiently influential or motivating so that it may lead to a conflict of interest?	Not Set ▼
Do I have doubts about my ability to act impartially in the public interest (ie to absolutely ensure that any private considerations do not affect my decisions/actions)?	Not Set ▼

Potential Benefits:

Could there be benefits for me now or in the future that could cast doubt on my objectivity?

Could I, or anyone associated with me, benefit now or in the future from my actions or decisions in relation to the matter? Not Set ▼

Could I, or anyone associated with me, be detrimentally affected now or in the future by my actions or decisions in relation to this matter? Not Set ▼

Have I received a benefit, gift, donation or hospitality (eg meals, drinks, tickets, etc) from someone who stands to gain or lose from a decision or action in relation to this matter? Not Set ▼

Am I, or anyone associated with me (eg a relative, friend or associate) likely to gain or lose financially if the matter is resolved a certain way? Not Set ▼

Could the matter have an influence on my future employment opportunities? Not Set ▼

Perceptions:

Remembering that perception is important, how will my involvement in the decision or action be viewed by others? Are there risks associated for me or my organisation?

Would it appear to a neutral or disinterested observer that my private interests were in conflict with my public duty? Not Set ▼

Could a neutral or disinterested observer reasonably believe my private interests had influenced me? Not Set ▼

Do I hold any private or professional views and biases that may lead others to conclude that I am not an appropriate person to deal with this? Not Set ▼

Are there perception risks for WA Health or myself if I remain involved? Not Set ▼

Would I think it was wrong or improper if I saw someone else doing this? Not Set ▼

Proportionality:

Does my involvement in the decision appear fair and reasonable in all the circumstances?

If I am not involved, is there a better way to ensure impartiality, fairness and to protect the public interest?

Is my involvement illegal?

Is my involvement contrary to WA Health policies and procedures and/or those of the public sector?

Do I need to seek advice from someone who knows about these things or who is an objective party?

Public Scrutiny Test:

What are the consequences if I ignore a conflict of interest? What if my involvement was questioned publicly?

Is the matter one of significant public interest? Is it controversial and likely to attract significant public attention?

Would I be unhappy if my private connection or association was made? Would I feel ashamed if my private interest was exposed on the evening news or the front page of a newspaper?

Would I find it hard to defend and justify my actions and/or involvement if questioned publicly?

Could my involvement result in negative consequences for others, WA Health or myself?

Promises and Obligations:

Have I made any promises or commitments, been involved in or contributed privately to the matter?

Do I have a current or previous relationship with interested parties that would place me under an obligation?

Do I have affiliations past or present (eg political, union, profession, religious) past or present that could place me under an obligation?

Step 4: Identify conflict and the proposed strategy for resolving or managing the conflict.

Complete the fields shown below. The “proposed strategy” section should provide significant detail of the steps to be undertaken to manage the conflict of interest, including any contingencies should those steps prove to be ineffective.

The identified conflict of interest is:

- Please select -
▼

The type of conflict is:

- Please select -
▼

Is it an isolated event

Is it an ongoing conflict of interest

Proposed strategy for resolving or managing the conflict of interest.

Comment/Notes:

In order to determine whether a conflict of interest is an actual, perceived or potential conflict of interest, it may be helpful to consider the following definitions and examples.

Type of conflict of interest	Examples
<p>An Actual conflict of interest occurs when there is a real conflict between a Department of Health employee or Health Service Provider staff member’s public duties and private interests. Where a person’s duties as a member of staff (that is the principal goals of the profession or activity, the duties of public office, the protection of clients, the health of patients, or the integrity of research) may be unduly influenced by a secondary interest (such as a personal or competing professional</p>	<p>Linda is on a panel in a recruitment process. When she starts assessing the applications, she sees that her friend Fred has applied for the position.</p>

interest, including secondary employment or office).	
A Perceived conflict of interest occurs when the public or a third party could form the view that a Department of Health employee or Health Service Provider staff member's private interest could improperly influence their decisions or actions, now or in the future, whether or not this is in fact the case.	Tony works in a procurement role. A friend offers Tony a ticket to a football game. Tony's friend happens to work for a telecommunications company that supplies mobile phones to WA Health.
A Potential conflict of interest occurs when a Department of Health employee or Health Service Provider staff member's private interests could conflict with their official duties in the future. 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.	Sarah is a pharmacist working in a WA public hospital. She seeks permission for secondary employment to work in her Auntie's pharmacy in her local shopping centre.

In identifying the type of conflict of interest, it may be worth noting that:

- a "financial conflict of interest" relates to a situation where a private duty concerns the financial interests of a person
- a "partiality conflict of interest" relates to a situation where a private duty may be likely to give preference to one person or group over another
- a "role conflict of interest" relates to a situation where a private duty arises as a result of a role, job or position held by a person.

In providing details of proposed strategy for resolving or managing a conflict of interest, it is best to be specific. Strategies may incorporate one or more of the following for managing a Conflict of Interest:

Record or register	Recording the disclosure of a conflict of interest in a register is an important first step. However, this does not necessarily resolve the conflict. It may be necessary to assess the situation and determine whether one or more of the following strategies is also required.
Restrict	It may be appropriate for the Department of Health employee or Health Service Provider staff member to restrict their involvement in the matter. For example, refrain from taking part in debate about a specific issue, abstain from voting on decisions, or restrict access to information relating to the conflict of interest. If this situation occurs frequently and ongoing conflict of interest is likely, further steps may be required.
Recruit	If it is not practical for the officer to restrict their involvement, an independent third party may need to be engaged to participate in, oversee or review the integrity of the decision-making process.

Remove	Removal from involvement in the matter altogether is the best option when ad hoc or recruitment strategies are not feasible or appropriate.
Relinquish	Relinquishing the personal or private interests may be a valid strategy for ensuring there is no conflict with an officer's public duty. This may be the relinquishing of shares or membership of a club or association.
Resignation	Resignation may be an option if the conflict of interest cannot be resolved in any other way, particularly where conflicting private interests cannot be relinquished.

Step 5: Nominate the person who should approve this report.

Enter the details of authorised person who is required to approve this conflict of interest declaration as shown below.

Please nominate the person who should approve this report

Approver HE Number

First Name

Last Name

Position

Approver Email

The WA health system entity is responsible for identifying who the authorised approvers are under this section. If you are unsure who this person is, please contact your Integrity area for further guidance.

Once completed, select “create” to send the declaration to the relevant approver.

The authorised approver for conflict interest declarations related to Chief Executives of Health Service Providers is the Director General of the Department of Health. Where a conflict of interest declaration is made in relation to a Chief Executive, the approver which should be selected in the Approver field is:

Approver HE: he164560
 First Name: SWIS
 Last Name: SWIS

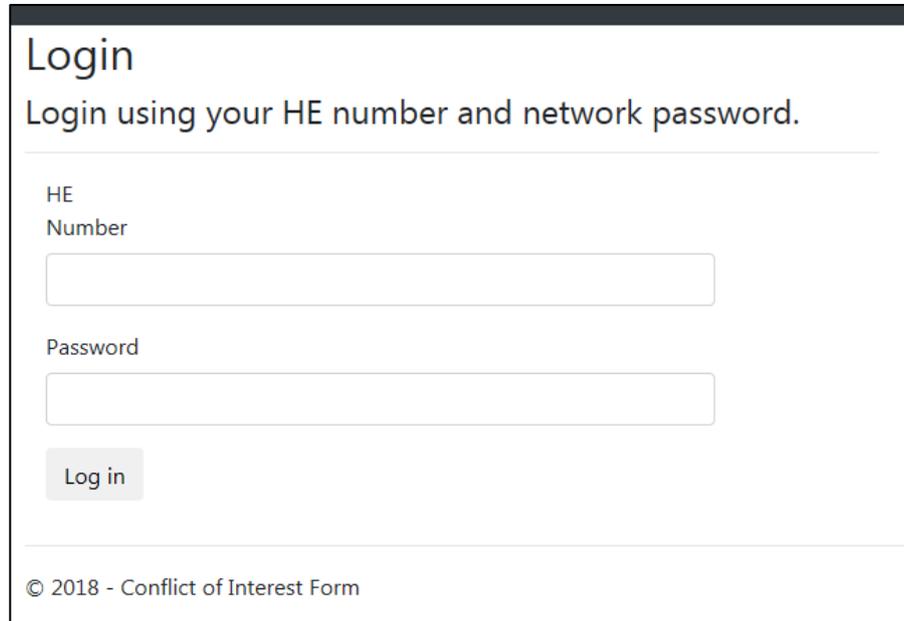
Step 6: Completion of declaration.

A declaration is only completed once it is approved. You will receive an automatically generated email advising when your conflict of interest declaration has been approved by the authorised person.

If you do not receive this email, discuss this matter directly with the approver to determine whether any changes are required. It is important that you ensure that your conflict of interest declaration is approved by the appropriate person.

Reviewing a Conflict of Interest Declaration

Once a conflict of interest declaration has been entered into the System Manager COIR, if you are the nominated approver you will receive an email containing a link to review and approve the conflict of interest. Follow this link and log in to the screen as shown below.



The screenshot shows a login interface with the following elements:

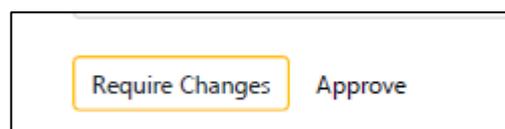
- Title:** Login
- Instruction:** Login using your HE number and network password.
- Fields:**
 - HE Number: A text input field.
 - Password: A text input field.
- Action:** A "Log in" button.
- Footer:** © 2018 - Conflict of Interest Form

You will be shown the completed details for the declaration as entered by the Department of Health employee or Health Service Provider staff member. Ensure that you consider the details entered carefully, and determine whether the proposed action is appropriate.

If you believe that some of the information is inaccurate or misleading, or that the Department of Health employee or Health Service Provider staff member making the declaration has failed to consider relevant factors, it is appropriate that you **discuss this directly** with them.

If you are unclear about the information in the declaration, it is important that you discuss the matter with the Department of Health employee or Health Service Provider staff member making the declaration to enable you to make a fully informed decision.

If the declaration is not sufficient, select "Require Changes" at the bottom of the screen as shown below, to enable the person who made declaration to edit their declaration. Ensure that if you do require changes, that you discuss this with the Department of Health employee or Health Service Provider staff member.



The screenshot shows two buttons side-by-side:

- Require Changes:** A button with a yellow border.
- Approve:** A button with a grey background.

You are able to enter comments that will be added to the declaration, providing further information to the declarer.

Comment	
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If you are satisfied with the declaration select “Approve”. This will notify the Department of Health employee or Health Service Provider staff member who made the declaration that their declaration has been reviewed and approved.