

Future Health Research and Innovation Fund Advisory Council

Conflicts of Interest Policy

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Policy Reference: FFAC-P-3

Version: 2.0

1. Introduction

The Western Australian Future Health Research and Innovation (FHRI) Fund Advisory Council (Advisory Council) is an advisory body established¹ by the Minister for Medical Research (the Minister)² under the *Western Australian Future Health Research and Innovation Fund Act 2012* (the Act).³

The Act provides for the Advisory Council to determine its own procedure subject to any matters determined by the Minister.⁴

The Advisory Council is subject to:

- legislative requirements under the Act
- requirements set out in the Instruments of Appointment
- the Advisory Council governance and policy documents and
- the *FHRI Scheme Governance Framework* (the *Governance Framework*)
- any Statement of Expectation issued by the Minister.

This *Conflict of Interest Policy* should be read in conjunction with the documents listed above.

2. Purpose

The purpose of the *Conflicts of Interest Policy* is to support Advisory Council members to effectively identify, declare, manage and, where possible, resolve conflicts of interest.

This policy provides the mechanism for compliance with the requirements of the Act that relate to conflicts of interest. Section 4I(1) provides that the following conditions relating to conflict of interest must form part of the conditions in a member's instrument of appointment:

- requires the member to disclose any actual, or potential, material conflict of interest that the member has arising out of the Advisory Council's function
- specifies when, how and to whom the disclosure must be made
- specifies any other steps that the member must take in relation to the conflict of interest.

3. Applicability

This *Conflicts of Interest Policy* applies to the Chair and all members of the Advisory Council. This includes voting and non-voting members, any alternate member appointed under section 4H(5) of the Act and any nominee under section 4G(3)(a), (b).

In cases where the Minister for Health considers it appropriate, the requirements under section 4 of this Policy related to members, apply to any person, other than a public service officer, who has a role in providing assistance to the Advisory Council.⁵

The Advisory Council secretariat in the Office of Medical Research and Innovation (Department of Health) provides operational support for functions relevant to this policy.

¹ *Western Australian Future Health Research and Innovation Fund Act 2012* (WA) s 4G.

² Whilst the Act references the Minister for Health, on 08/02/2022 the Governor committed the Act (except Part 3) to the Minister for Medical Research and all references to the Minister for Health in the Act are to be read as the Minister for Medical Research.

³ [Western Australian Future Health Research and Innovation Fund Act 2012 \(WA\)](#)

⁴ *Western Australian Future Health Research and Innovation Fund Act 2012* (WA) s 4H(2), (3).

⁵ [Western Australian Future Health Research and Innovation Fund Act 2012 \(WA\)](#) s 4I(3).

4. Mandatory requirements

Compliance with the *Conflicts of Interest Policy* is a condition of appointment as a member of the Advisory Council as specified in the relevant Instrument of Appointment.

Advisory Council members are required to sign an acknowledgment of having read and understood this policy (refer Appendix 1).

5. Conflicts of interest

Effective management of conflicts of interest is an essential part of managing integrity of the Advisory Council.

It is not always possible to avoid a conflict of interest and having a conflict is not itself necessarily wrong or unethical. What is most important is that conflicts of interest are identified, disclosed, managed and, where possible, resolved.

Conflicts of interest may be:⁶

- Direct: a form of conflict that arises from a member's personal interests
- Indirect: a form of conflict that arises from personal interests of individuals or groups that the officer associates with

Conflicts of interest may be:⁷

- Actual: where a member's personal interests and public duties conflict, it is happening now and needs to be declared and managed.
- Potential: where the conflict between a member's personal interest and public duty is likely to occur in the future.
- Perceived: where a reasonable third party could for a view that personal interests could improperly influence the member's decisions now or in the future, whether or not this is in fact the case.

Interests may be personal in nature (such as relationships, business interests, memberships/affiliations, other employment or through receiving gifts, benefits, hospitality) or they may be related to other official roles where responsibility of the relevant authorities may overlap.⁸

6. Policy

The *Conflicts of Interest Policy* is informed by the following Public Sector Commission (PSC) resources:

- [Commissioner's Instruction 40 Ethical Foundations](#)
- [Conflicts of Interest Guide](#) [PSC website]
- [Governance Manual for WA Government Boards and Committees \(October 2023\)](#)

The *Conflicts of Interest Policy* should be read in conjunction with other Advisory Council policies:

- *Charter* (Policy Ref: FFAC-P-1)
- *Code of Conduct* (Policy Ref: FFAC-P-2)

⁶ Reproduced from Public Sector Commission (PSC) [Conflicts of Interest Guide](#), [website updated 7/7/2025], Government of Western Australia and adapted to reference 'member'.

⁷ Reproduced from PSC [Conflicts of Interest Guide](#), [website updated 7/7/2025], Government of Western Australia and adapted to reference 'member'.

⁸ Reproduced and adapted from PSC [Conflicts of Interest Guide](#), [website updated 7/7/2025], Government of Western Australia.

- *Gifts, Benefits and Hospitality Policy* (Policy Ref: FFAC-P-4)

6.1. Policy position

Advisory Council members are required to act in alignment with required standards of conduct and integrity, and must manage conflicts of interest by:

- avoiding situations which may give rise to conflicts where practicable;
- identifying and disclosing relevant interests, including those that give rise to actual, potential or perceived conflicts of interest; and
- complying with this policy.

Advisory Council members must complete the Statement of Private Interests Form (Appendix 2) and Conflict of Interest Disclosure Form (Appendix 3) where applicable (refer sections 6.4 and 6.5).

6.2. Responsible decision-maker

The responsible decision-maker is to assess conflict of interest declarations and decide whether a conflict exists and if so, what management strategy is required.

For Advisory Council members (or others) making a declaration, the responsible decision-maker is the Advisory Council Chair.

If the Advisory Council Chair is making a declaration, the responsible decision-maker is a senior representative of the Department of Health.

6.3. Responsibilities

The Advisory Council Chair is responsible for:

- ensuring receipt of Advisory Council members signed Acknowledgement Forms
- ensuring Advisory Council members (and others as relevant) remain aware of their responsibilities for declaring conflicts of interest as and when they become aware of them
- providing a point of contact for anyone wanting assistance in identifying a conflict of interest, or information or advice about the policy's meaning or application
- assessing whether a conflict of interest exists and determining appropriate management strategies (except for those as declared by the Chair)
- ensuring that all declarations of interest (including those raised at meetings), conflicts of interest assessments and agreed management strategies are recorded in the *Conflict of Interest Register* (and Advisory Council meeting minutes where applicable)
- appropriately addressing possible breaches of the policy
- managing review of the policy.

Advisory Council members are responsible for:

- reading and understanding the policy, signing the Acknowledgement Form and raising any queries with the Chair of the Advisory Council or the secretariat
- identifying and declaring relevant interests and conflicts of interest to the Chair

- regularly reviewing the interests they declared upon appointment or reappointment as members, and disclosing any new interests or conflicts of interest as soon as they become aware of them

The Director General of the Department of Health (DoH) is responsible under the Act for:⁹

- keeping a record of each disclosure that is made by a member of the Advisory Council (or other person as may be required under certain provisions)
- Keeping a record of any other steps that are taken in relation to any actual, or potential, conflict of interest that is disclosed
- Making a summary of the record available, on request, for inspection.

The secretariat is responsible for:

- operational support for the Advisory Council Chair and members in actioning the requirements of the *Conflict of Interest Policy* (including maintenance of the Conflict of Interest Register)
- operational support for the Director General DoH in discharge of their relevant responsibilities under the Act.

6.4. Disclosing interests

All Advisory Council members are to complete the Statement of Private Interests Form (Appendix 2), where relevant to the function to the Advisory Council, as soon as practicable when appointed/reappointed or before performing any duty or action in regard to being a member of the Advisory Council.

Members should also complete the Statement of Private Interests Form as an annual declaration.

Disclosed interests must be recorded in the *Conflicts of Interest Register*.

If a member's, or other person's, circumstances change they must reassess their interests and, if appropriate, update their disclosures by completion and submission of the Statement of Private Interests Form (with noting that it is an update rather than a full declaration).

Cessation of interest

Where an interest disclosed by a member is no longer relevant (e.g. resignation from role or office held), then the member is to advise the secretariat in writing of the details of the change of circumstance so that the *Conflict of Interest Register* can be updated accordingly.

6.5. Identifying, disclosing and managing conflicts of interest

The responsibility to identify and manage a conflict of interest ultimately rests with the Advisory Council member (or other person as identified in section 2).

Identified conflicts of interest

Upon identifying a conflict of interest, Advisory Council members are to complete and submit a Conflict of Interest Disclosure Form (Appendix 3). Refer section 6.6 for guidance.

The Responsible Decision-maker is to:

⁹ Western Australian Future Health Research and Innovation Fund Act 2012 (WA) s 41(4).

- assess interest disclosures and identify if a conflict of interest exists
- review and assess declared conflicts of interest
- determine the appropriate management strategy.¹⁰

When an actual, potential or perceived conflict of interest has been identified then it must be recorded in the *Conflicts of Interest Register* along with the management strategy.

Advisory Council meetings

Each meeting will commence with the Chair calling for any conflict of interest disclosures – members are to disclose if they have a conflict of interest with any of the items on the agenda or others they wish to declare. Should a member become aware of a conflict of interest during the course of an Advisory Council meeting, the member is to immediately raise and make the disclosure so that it can be appropriately managed. All disclosures raised and management strategies put in place are to be documented in the meeting minutes and added to the *Conflict of Interest Register*.

Cessation of conflict of interest

Where a situation has changed and a conflict of interest disclosed by a member is no longer current (e.g. resignation from role or office held), then the member is to advise the secretariat in writing of the details of the change of circumstance so that the *Conflict of Interest Register* can be updated accordingly.

6.6. Guidance for members

Appendix 4 outlines the steps for Advisory Council members, responsible decision-makers and other to take to effectively manage their responsibilities related to conflicts of interest. It includes further definition of terms and tools to support identification and management of conflicts of interest.

7. Compliance and monitoring

Advisory Council members must sign the Acknowledgement Form (Appendix 1) as soon as practicable when commencing as a new or reappointed member. Advisory Council members must provide the Acknowledgement Form before undertaking any role as an Advisory Council member. The Chair of the Advisory Council is responsible for monitoring compliance via signing for the receipt of the Acknowledgement Form.

Advisory Council members must also complete and submit the Statement of Member Interests Form and, if relevant, the Conflict of Interests Disclosure Form, when commencing as a new or reappointed member. The Chair of the Advisory Council is responsible for ensuring that the responsible decision-maker has addressed their requirements associated with the submitted forms.

Compliance with the policy will be monitored via:

- ensuring the *Conflicts of Interest Register* is accurate and up to date
- tabling of interests and conflict of interest disclosures to Advisory Council meetings
- performance evaluation surveys of Advisory Council members
- review of any feedback, complaints or issues raised

The Chair is supported by the secretariat in monitoring and review activities.

Non-compliance with the policy will be managed via the relevant responsible decision-maker and in accordance with provisions in the *Charter* and *Code of Conduct*.

¹⁰ The responsible decision-maker may seek further advice from the Public Sector Commission and/or the Minister if required.

8. Record keeping

The secretariat will maintain the corporate files of relevant information including:

- the *Conflict of Interest Register*
- the *Gifts, Benefits and Hospitality Register*
- Acknowledgement Forms (Form Ref: FFAC-P-3-F-1)
- Statement of Private Interest Forms (Form Ref: FFAC-P-3-F-2)
- Conflict of Interest Disclosure Forms (Form Ref: FFAC-P-3-F-3)
- related correspondence and papers

The Director General is responsible for keeping a record of information relating to disclosures of conflicts of interest and making a summary of the record available for inspection upon request.¹¹

The files are the property of the Department of Health. Record keeping obligations must be complied with, including those obligations under the *State Records Act 2000* (WA) and the *Freedom of Information Act 1992* (WA).

Access to the above Registers is restricted to the Chair of the Advisory Council and the secretariat. Access by other parties must be approved by the Chair of the Advisory Council. Proposed and granted access will be recorded in the relevant Register.

9. Related policies and supporting information

The following information relates to, or informs and/or supports the implementation of this Policy:

Advisory Council policies

- *Advisory Council Charter* (Policy Ref: FFAC-P-1)
- *Advisory Council Code of Conduct* (Policy Ref: FFAC-P-2)
- *Advisory Council Gifts, Benefits and Hospitality Policy* (Policy Ref: FFAC-P-4)

Government resources

- Public Sector Commission *Commissioner's Instruction 40 Ethical Foundations*
- Public Sector Commission *Governance Manual for WA Government Boards and Committees (October 2023)*
- Public Sector Commission website www.psc.wa.gov.au
 - Conduct and integrity
 - Conflict of Interest Guide
 - Governance of WA government Boards and Committees
 - Commissioner's Instructions

10. Document control

Approval

The Advisory Council is authorised to determine its own procedure subject to any matters determined by the Minister.¹² The Advisory Council is responsible for approval of this policy.

¹¹ *Western Australian Future Health Research and Innovation Fund Act 2012* (WA) s 4I(4).

¹² *Western Australian Future Health Research and Innovation Fund Act 2012* (WA) s 4H(2), (3).

Review

The Advisory Council will review this policy annually, or at another interval not exceeding five years.

Document Control table

Version	Effective from	Effective to	Approved date	Approved By	Description
1.0	22/02/2021		22/02/2021	Advisory Council	Advisory Council endorsement of the Policy at its meeting of 22 February 2021
1.1	03/08/2022			<i>Minor update – retention of formal approved date as 22/02/2021</i>	- Updated policy to refer to new responsible Minister, change in name to Office of Medical Research and Innovation. - Deleted references to outdated information and made changes to be consistent with other Advisory Council governance documents. - Corrected typographical errors
1.2	NA	NA	NA	NA	Formal Review March 2026. - Version drafted for review/approval. - Version 1.2 endorsed by FHRI Fund Advisory Council on 31/03/2026. - For legal review ahead of Minister review/approval.
1.3	NA	NA	NA	NA	Draft finalisation May 2026. Minor edits. Version 1.3 submitted to Minister for approval.
2.0	27/07/2026		27/07/2026		Noted by Minister 27/07/2026. Version finalised for release as v2.0 based on FHRI Fund Advisory Council endorsement 31/03/2026.

Appendices

Appendix 1 – Conflicts of Interest Policy Acknowledgement Form (Form Ref: FFAC-P-3-F-1)

Appendix 2 – Statement of Member Interests Form (Form Ref: FFAC-P-3-F-2)

Appendix 3 – Conflicts of Interests Disclosure Form (Form Ref: FFAC-P-3-F-3)

Appendix 4 – Steps to take to identify and manage conflicts of interest

APPENDIX 1

*Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy***Future Health Research and Innovation Fund Advisory Council****Conflicts of Interest Policy
Acknowledgement Form**

I have read and understood the Advisory Council *Conflicts of Interest Policy* and agree to comply with it in accordance with the terms of the Instrument of Appointment.

I am committed to working in accordance with the *Conflicts of Interest Policy* and accept my responsibilities within this framework.

Confirmation of acknowledgement: Advisory Council member

Name			
Signature		Date	

Receipt of acknowledgment: Advisory Council Chair*

Name			
Role			
Signature		Date	

**Where the Advisory Council Chair is also the member making the acknowledgement, this form will be receipted by a senior representative of the Department of Health.*

Please forward a completed signed copy of this acknowledgement form to the secretariat in the Office of Medical Research and Innovation, Department of Health via: FHRI.Fund@health.wa.gov.au

APPENDIX 2

Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy

Future Health Research and Innovation Fund Advisory Council

Conflicts of Interest Policy

Statement of Private Interests Form

The Statement of Private Interests form¹ is to be completed by Advisory Council members (and others where relevant). Only include details that are **relevant to the Advisory Council's role and function**, or to your public duty as an Advisory Council member, or that might be open to implications of conflict of interest. Please carefully consider all private interests, for the current year and previous three calendar years, to determine if they should be recorded in this form. If in doubt, it is better to record the interest than not.

PART 1 – Advisory Council member to complete

Member making statement

Full Name

Purpose of statement submission

☐ New appointment/reappointment

☐ Annual Full Statement

☐ Update/addition

a) Shareholdings

Do you or a family member have shareholdings, securities (including cryptocurrency and non-fungible tokens) or other financial or business interests? If yes, could this impact, or be seen to impact your ability to undertake your duties and responsibilities properly and impartially as a public officer now or in the future? If yes, please complete a Conflict of Interest Disclosure Form. Please list. Include: owner, company, nature of company's activities.

<u>Owner</u>	<u>Company</u>	<u>Nature of company activities</u>
1.	1.	1.
2.	2.	2.
3.	3.	3.

b) Office holder

I, and/or the persons associated with me, hold the following offices, whether remunerated or not. These may include offices such as directorships and board, council, committee and advisory group memberships. Could these impact, or be seen to impact your ability to undertake your duties and responsibilities properly and impartially as a public officer now or in the future? If yes, please complete a Conflict of Interest Disclosure Form.

Please list. Include: person, office held, organisation, activities of organisation.

<u>Person</u>	<u>Office held</u>	<u>Organisation</u>	<u>Activities of organisation</u>
1.	1.	1.	1.
2.	2.	2.	2.
3.	3.	3.	3.
4.	4.	4.	4.
5.	5.	5.	5.

c) Partnerships

¹ Originally adapted from Queensland Independent Commission Against Corruption and the Crime and Misconduct Commission, *Managing Conflicts of Interest in the Public Sector Toolkit*, November 2004. Content updated to align where relevant with PSC, [Statement of personal interests for chief executive officers](#), [website updated 30 April 2024], Government of Western Australia.

APPENDIX 2

Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy

I, and/or the persons associated with me, am/are a member of the following partnership(s).

Could these impact, or be seen to impact your ability to undertake your duties and responsibilities properly and impartially as a public officer now or in the future? If yes, please complete a Conflict of Interest Disclosure Form.

Please list. Include: person holding interest, partnership nature, year business formed, nature of interest.

<u>Person</u>	<u>Partnership</u>	<u>Year business formed</u>	<u>Nature of interest</u>
1.	1.	1.	1.
2.	2.	2.	2.

d) Sources of income

I, and/or the persons associated with me, have the following sources of income (no need to declare remuneration as an Advisory Council member).

Could these impact, or be seen to impact your ability to undertake your duties and responsibilities properly and impartially as a public officer now or in the future? If yes, please complete a Conflict of Interest Disclosure Form.

Please list. Include: person/recipient, nature of income.

<u>Person/recipient</u>	<u>Nature of income</u>
1.	1.
2.	2.

e) Gifts, benefits or hospitality

I, and/or the persons associated with me, have received the following sources of gifts, benefits or hospitality during the last 3 years.

Only declare that which is relevant to your role and duty as an Advisory Council member. For example gift received from a research institution that is a potential FHRI Fund applicant; purely personal or other gifts, benefits and hospitality do not need to be listed unless they give rise to a conflict of interest.

Could these impact, or be seen to impact your ability to undertake your duties and responsibilities properly and impartially as a public officer now or in the future? If yes, please complete a Conflict of Interest Disclosure Form.

Please list. Include: person/recipient, nature of gift/benefit/hospitality, approximate value, year received.

<u>Person/recipient</u>	<u>Nature of gift/benefit/hospitality</u>	<u>Approx value</u>	<u>Year received</u>
1.	1.	1.	1.
2.	2.	2.	2.

f) Any other private interest

I, and/or the persons associated with me, have the following interests (financial or otherwise) not mentioned elsewhere in this statement, the nature of which give rise to, or may be seen to give rise to, a conflict of interest with my duty and role as an Advisory Council member. For example: other assets or liabilities, family or business trust beneficial interest or trustee, making significant contributions/donations. Please complete a Conflict of Interest Disclosure Form.

Please list. Include: person/recipient, nature of other interest.

<u>Person/recipient</u>	<u>Nature of other interest</u>
1.	1.
2.	2.

Member declaration

I declare that the information I am providing in this statement is true and accurate to the best of my knowledge. I have considered my role, responsibilities and private interests and where there is or may be a risk of conflict of interest, I will complete a Conflict of Interest Disclosure Form and manage the conflict in accordance with the *Conflicts of Interest Policy*.

Name	
Signature	Date



ACTION REQUIRED: Member to send to secretariat FHRI.Fund@health.wa.gov.au

APPENDIX 2

Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy

PART 2 – Responsible decision-maker to complete**Responsible decision-maker****Name****Role****Confirmation of review of statement**☐ Reviewed and no further action required☐ Reviewed and further action required**Comments:****Signature****Date****ACTION REQUIRED:** Return to secretariat FHRI.Fund@health.wa.gov.au**PART 3 – Secretariat to complete****Addition to Conflict of Interest Register**☐ Confirmation of addition to register☐ Return of completed form to member**Date**

APPENDIX 3

Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy

Future Health Research and Innovation Fund Advisory Council

Conflicts of Interest Policy

Conflicts of Interest Disclosure Form

PART 1 – Advisory Council member to complete**Member making statement**

Full Name

a) Details of the disclosure

Describe the situation or matter

-
-
-

Determine if a conflict of interest existsRefer to guidance materials in the *Conflicts of Interest Policy* (Appendix 3 and Appendix 4).

Confirm if a conflict of interest was identified:

- ☐ No conflict of interest was identified *Proceed to declaration*
- ☐ A conflict of interest was identified *Proceed to part b)*

b) Describe the nature of the conflict of interest¹

The nature of the identified conflict of interest is:

- ☐ An **actual** conflict ☐ A **potential** conflict ☐ A **perceived** conflict

c) Proposed strategy for managing or resolving the conflict of interest²

-
-
-

Member declarationI declare that the information I am providing in this disclosure is true and accurate to the best of my knowledge. I agree to manage the conflict in accordance with the *Conflicts of Interest Policy*.

Name

Signature

Date

**ACTION REQUIRED:** Member to send to secretariat FHRI.Fund@health.wa.gov.au¹ Refer to Appendix 3 and Appendix 4 of the Conflicts of Interest Policy for further information and definitions.² Refer to Appendix 3 of the Conflicts of Interest Policy for further information on management strategies.

APPENDIX 3

Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy

PART 2 – Responsible decision-maker to complete**Responsible decision-maker****Name****Role****Recommendation**

I have reviewed the information provided and recommend the following management strategy/ies:

- ☐ **Record/register** Record the disclosure in the Conflict of Interest Register
- ☐ **Restrict** Restrict the member's involvement in the matter
- ☐ **Recruit** Recruit an independent third party to oversee the process or review decision/s
- ☐ **Remove** Remove involvement of the member in the matter altogether
- ☐ **Relinquish** Relinquish private interests that are creating the conflict
- ☐ **Resign** Recommendation to resign is a significant undertaking. If this strategy is considered for recommendation, then further advice to be sought.

Comments:**Signature****Date**

ACTION REQUIRED: Return to secretariat FHRI.Fund@health.wa.gov.au

PART 3 – Secretariat to complete**Addition to Conflict of Interest Register**

- ☐ Confirmation of addition to register
- ☐ Return of completed form to member

Date

APPENDIX 4

Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy

Steps to take to identify and manage conflicts of interest**1. Identify and disclose private interests**

When considering private interests and matters that may arise in relation to conflicts of interest, the member must act in accordance with the *Conflicts of Interest* policy.

Members to complete and submit the Statement of Private Interests Form and proactively identify and conflicts of interests.

2. Identify conflicts of interest

When considering private interests and matters that may arise in relation to conflicts of interest, the member must act in accordance with the *Conflicts of Interest* policy.

Where unclear, this ought to be discussed with the Chair of the Advisory Council (or other responsible decision-maker as relevant) to support the identification process.

The 6Ps¹ decision-making tool can be used to assist:

Public duty vs personal interest:

- Do I have a personal interest that may conflict or be seen to conflict with my public duty – roles and responsibilities – in this situation?
- What does my public duty require (for example, legislation, code of ethics, authority code of conduct and policies)?

Potentialities:

- Could there be benefits for me or someone important to me now or in the future that could cast doubt on my impartiality?

Perception:

- How will my involvement in the decision/action be viewed by others if they knew about my public duties and my interests?
- Would a neutral/reasonable person think these personal interests could conflict with my public duties?
- How damaging could perceptions be to me or my authority?

Proportionality:

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

Presence of mind:

- If I ignore a conflict of interest, what are the consequences for me, others, my colleagues, the public and my authority?
- Would my involvement withstand public scrutiny?
- Who should I be discussing this with?

Promises:

- Have I made any promises or commitments in relation to the matter?

¹The 6Ps and 6Rs tools, reproduced from PSC [Conflicts of Interest Guide](#), [website updated 7/7/2025], Government of Western Australia.

APPENDIX 4

*Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy***3. Assess conflicts of interest**

Once a conflict of interest has been identified, the member must complete and submit a Conflicts of Interest Disclosure Form.

The conflict of interest must be described in full for clarity and transparency, and classified according to the following definitions²:

Nature of the conflict of interest:

- Actual
Where a member's personal interests and public duties conflict, it is happening now and needs to be declared and managed.
- Potential
Where the conflict between a member's personal interest and public duty is likely to occur in the future.
- Perceived
Where a reasonable third party could for a view that personal interests could improperly influence the member's decisions now or in the future, whether or not this is in fact the case

4. Managing conflicts of interest

The member is to propose appropriate management strategy/ies. This will be reviewed by the relevant responsible decision-maker (usually the Chair of the Advisory Council, unless it is the Chair making the disclosure)

In identifying appropriate strategies for management of the conflict of interest, the 6Rs³ tool can be used to assist:

Record/Register:

- Record the disclosure of a conflict of interest in a register or some other manner.
- Exercise caution in determining whether this is a suitable management strategy or just the first step and other management strategies are required.
- Where significant risks are posed by a conflict of interest, recording/registering is the minimum requirement and is accompanied by another management strategy.

Restrict:

- Restrict an officer's involvement in the matter to separate them from parts of the activity/issue that give rise to the conflict.
- 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.
- This strategy is useful for situations that occur infrequently and where it is possible to separate parts of the activity involved.

² Reproduced from PSC [Conflicts of Interest Guide](#), [website updated 7/7/2025], Government of Western Australia and adapted to reference 'member'.

³ [The 6Ps and 6Rs tools](#), reproduced from PSC [Conflicts of Interest Guide](#), [website updated 7/7/2025], Government of Western Australia.

APPENDIX 4

*Future Health Research and Innovation Fund Advisory Council Conflicts of Interest Policy***Recruit:**

- Recruit an independent third party to oversee part or all of the process or review the decision making process.
- 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.
- 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.
- This strategy is not realistic where the conflict is ongoing.

Remove:

- Remove involvement in the matter altogether. This could be the best option when ad hoc or recruitment strategies are not feasible or appropriate.
- 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.

Relinquish:

- Relinquish personal interests that are creating the conflict.
- This strategy ensures there is no conflict with an officer's public duty. Examples include relinquishing shares or membership of a club/association.
- 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.

Resign:

- 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.

NB: resigning is a significant undertaking in the context of the Advisory Council and if this strategy is considered for recommendation, then further advice ought to be sought and appropriate discussions held with the member concerned.