



Conflict of Interest Policy

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This procedure reflects legislation and official guidance at the time it was last reviewed. Any changes in legislation will take precedence over anything printed in this policy. Where other policies are referred to, they can be viewed at the Policy Library

1. Introduction

This Policy sets out the approach to the management and avoidance of conflicts of interest at the RSN. This Policy upholds the provisions of the Code of Conduct for Employees and the RSN Employee Handbook. The Policy must be read in conjunction with the Procedure and Schedule.

The RSN acknowledges that individuals to whom this Policy applies may have external interests which run parallel to or have no connection whatsoever with the interests of the RSN.

This Policy is designed to promote and support the awareness and appropriate management and avoidance of actual, potential, or perceived conflicts of interest when they occur. The implementation of this Policy will aim to protect both the RSN and individuals to whom it applies.

2. Scope

The Policy applies to:

Full and part-time employees, tutors, contractors of goods and services and volunteers and other unpaid individuals performing duties for the RSN.

The Policy applies to these categories of people, regardless of whether they also fall into a category of persons not covered by the scope of this Policy. For instance, part-time employees who are also students of the RSN, or employees who are also members of the Governing Authority.

This Policy also applies to a conflict arising in relation to persons or entities 'closely connected' to individuals covered by the scope of this Policy, for example:

- Spouse, partner or relatives to include parent, brother, sister, child or step-child;
- Entities external to the RSN with which the individual is associated;
- Persons acting as the trustee of any trust of which the individual (or any other closely connected person or entity to that individual) is a beneficiary, and;
- Persons acting as a business partner of the individual (or any other closely connected person or entity to that individual).

For clarification, individuals covered by the scope of this Policy are in a position to influence or be perceived to be able to influence, directly or indirectly that could result in personal gain for themselves or the closely connected person.

3. Policy Implementation

Ultimate responsibility for establishing Policy for the avoidance of conflicts of interest rests with the RSN Council.

It is the shared responsibility of all employees to identify and raise concerns about perceived, potential or actual conflicts of interest. These concerns should be raised with the line manager at the earliest opportunity as an operational management issue. In the case of a contract for goods and services this should be raised with the Director of Finance.

4. Definition of Conflicts of Interest

For the purpose of this policy “Conflict(s) of Interest” is defined as and includes the following types of conflict:

4.1 Actual

An actual conflict of interests emerges when individuals within the scope of this Policy have personal interests which:

conflict with the interests of RSN;
conflict with their responsibility to act in the best interests of RSN;
put into question the independence, impartiality and objectiveness that they are obliged to exercise in the performance of their duties.

4.2 Perceived

On a “balance of probabilities” perceived conflict of interests may arise when personal interests put into question the independence, impartiality and objectiveness that they are obliged to exercise in the performance of their duties.

A potential conflict of interests describes a situation that could develop into an actual or perceived conflict of interests.

Personal interests may include (but are not limited to):

- The performance of financial or other economic investments, including occupational income, shares, directorships, etc.;
- Personal or family ambition, wealth or status gain, and;
- The achievement or realisation of particular political, academic, economic or social objectives.

The personal interests could be direct or indirect and include the interest of a Connected Person.

The RSN’s interest is as a provider of academic, research or commercial activities that may be impacted through a conflict of interest.

5. Loyalty

Individuals within the scope of this Policy have a duty of trust and confidence to the RSN and are required, while engaged in RSN duties to accord their primary professional loyalty to the RSN. Employees, in particular, are expected to arrange outside obligations, personal interests and activities so as not to conflict with their overriding commitment to the RSN.