

## FAQ – Conflict of Interest Declarations in eduPay

### WHAT IS THE PURPOSE OF THE EDUPAY CONFLICT OF INTEREST DECLARATION FORM?

#### What is the purpose of the form?

The Conflict of Interest Declaration form in eduPay streamlines the process for declaring and managing conflicts of interest (COI). It simplifies the process by:

- enabling staff to keep up to date and accurate declarations
- providing a system for consistent management of COI declarations
- creating a central record for COI declarations and the steps in place to manage them
- enabling the centralised monitoring and analysis of COI data
- ensuring that COI declarations remain accessible even if a staff member changes roles or has a new manager.

#### Is this a new obligation?

- No, the Department’s [Conflicts of Interest Policy](#) and the [Code of Conduct for Victorian Public Sector Employees](#) require **all** employees to declare conflicts of interest.
- The COI declaration form in eduPay provides a system to support best practice management of COI declarations.

### WHO IS REQUIRED TO COMPLETE THE EDUPAY CONFLICT OF INTEREST DECLARATION FORM?

#### Who is required to use the eduPay form?

- All employees are required to declare conflicts of interest, but the following employees **must** use the eduPay form to declare conflicts of interest:
  - regional and central staff
  - executive employees
  - school principals and Assistant Principals
  - school Business Managers and other school staff whose roles involve procurement
- Principals may choose to require other school staff to declare conflicts of interest using the eduPay form or record their declaration following a local process.

#### Are teaching staff required to use the eduPay form?

- Teaching staff are not required to use the eduPay form. COI declarations by teaching staff can be made following the school’s existing local process or principals may choose to ask staff to use the eduPay form.

**Are school councillors required to use the eduPay form?**

- School Council members who are not employees of the Department are not required to use the eduPay form.
- School councillors are required to declare conflicts of interest in a subject or matter under discussion at a school council meeting and take appropriate steps including stepping out of a decision or discussion. Declarations of conflicts of interest must be recorded in the meeting minutes.

**WHEN DO I COMPLETE THE EDUPAY CONFLICT OF INTEREST DECLARATION FORM?**

**When do I need to use the eduPay form?**

- The form should be completed whenever a conflict arises between your private interests and public duty. Your private interests can be financial and non-financial, and can include the interests of family members and close friends or associates. Your public duty is activities that you undertake as part of the performance of your role.

**Do I need complete the form if I have nothing to declare?**

- No; the form only needs to be completed when you identify a conflict of interest. Unlike the Declaration of Private Interests form which needs to be completed annually (and updated when circumstances change), the Declaration of Conflict of Interest form only needs to be completed when a conflict of interest arises for you. If you have no conflicts of interest to declare, it does not need to be completed.

**Do I need to declare historical conflicts of interest in this form?**

- You do not need to enter past conflicts of interest that are no longer active. You only need to enter any **existing** or **new** conflicts of interest in the form.
- If you have an existing conflict of interest (such as a family member on your staff), you now need to record this declaration and management steps in place in the eduPay form. If you have an existing record in writing of management steps in place, you can copy this into the form and submit for approval.

**What do I do with recent email-based COI declarations I sent to my manager?**

- If the COI still exists, you will need to create an entry on eduPay. You can copy and paste email approval into the free text boxes in the form and submit for approval.

**HOW DOES THE EDUPAY CONFLICT OF INTEREST DECLARATION FORM WORK?**

**How do I access the online form?**

- The COI declaration form is available to all Department employees in eduPay in the Employee Self Service portal.

**How does the form work?**

- Staff should complete a new declaration whenever a conflict of interest arises. The form prompts the entering of relevant information, including any steps to manage and mitigate risk created by the COI.
- Declarations are submitted via a workflow notification to the declarant's manager/principal for approval.
- Declarations made by school principals have an additional step requiring Area Executive Director review of the declaration. Area Executive Directors then submit a recommendation, via a workflow, to the Regional Director for approval.

**What happens if I require urgent approval of a declaration?**

- If you require urgent approval of your declaration and proposed management steps (for example, to proceed with a recruitment or procurement process), you should discuss the matter with your manager or principal, or Senior Education Improvement Leader

or Area Executive Director, and gain approval without waiting for approval via the eduPay form. The COI declaration form must then be submitted in eduPay to record your declaration and agreement on management steps.

### **What happens when I submit the declaration form?**

- When you have completed the form, your declaration will be submitted to your manager/principal for approval. Your manager/principal will review your declaration and either push it back to you with comment or approved it.
- For principals, approval of your declaration has an additional step. Your declaration will first be submitted to your Area Executive Director for review. Your Area Executive Director can either push it back to you with comment or submit it on to your Regional Director with a recommendation for approval. Your Regional Director will then review it and either push it back to you with comment or approve it.
- If your declaration is pushed back, you can amend your form taking into account your approver's comment(s) and re-submit.
- You will receive email notifications when your declaration is pushed back or approved.
- Once your declaration has been approved, it will remain open in eduPay. You will receive periodic reminders (six monthly or yearly) to consider whether to close your declaration (if the conflict of interest no longer exists) or submit an updated declaration (if circumstances have changed). Your declarations remain in eduPay as a record for you and your manager, and may be audited or monitored.

### **What is the 'review period'?**

- The form asks you to nominate a preferred time period for when you will receive reminders to review your declaration.
- Once your declaration has been approved, it will remain open in eduPay. You will received periodic reminders (six monthly or yearly as nominated by you) to review your declaration until you close it.
- When you review your declaration, you should consider if the conflict of interest continues to exist and whether the agreed recorded management steps in place are current and accurate. If the declaration is still current, you do not need to take any action and you will continue to receive periodic reminders to review the declaration.
- If the conflict of interest no longer exists, you should close the declaration. You can close an approved declaration at any time by clicking on CLOSE in your form (this option only appears in approved declarations). Closed declarations will remain on eduPay as a record for you and your manager/principal.
- If the details of the conflict of interest or the management steps have changed, you should close the declaration, complete a new updated Conflict of Interest declaration and submit it for approval.

## **HOW DOES THE EDUPAY CONFLICT OF INTEREST DECLARATION FORM RELATE TO OTHER DECLARATIONS, FORMS AND PROCESSES?**

### **How does this form differ from the Declaration of Private Interests form?**

- All principals, executives, including executive class employees, and VPS employees with a financial delegation of \$50,000 or more are considered 'relevant officers' and are required to complete the

Declaration of Private Interests form annually and update the form whenever there is a change in your declarable private interests. See the [FAQ](#) for more information.

- If any private interest gives rise to a conflict of interest it must be declared in this form, in addition to completing the Declaration of Private Interests form where required.
- The Declaration of Private Interests form is required to be completed annually. The COI declaration form should be completed whenever a conflict arises.

### **What do I do about Other Employment applications?**

- This process does not replace the need to apply for approval to undertake a second or voluntary role in accordance with the Other Employment Policy and approval form. You will need to also declare a conflict of interest if your other employment gives rise to a conflict.

### **Do I need to complete this form if I have already declared conflict of interest in a recruitment process?**

- Yes, if you have a conflict of interest, even if you have declared the conflict as part of a recruitment process, you will also need to complete this form.
- Declaring the conflict using the online form is keeps the information recorded in your eduPay and provides an opportunity to set out the management steps taken to avoid or manage the conflict. It also gives your manager/principal visibility of the conflict of interest and how it has been managed.

### **Do I need to complete this form if I have already declared a conflict of interest in procurement process?**

- Yes, if you have a conflict of interest, even if you have declared the conflict in undertaking the procurement process, you will also need to complete this form.
- Declaring the conflict using the online form keeps the information recorded in your eduPay and provides an opportunity to set out the management steps taken to avoid or manage the conflict. It also gives your manager/principal visibility of the COI and how it has been managed.

## **WHAT HAPPENS TO MY INFORMATION?**

### **Who can access the declarations that I enter in the form?**

- Both you and your current manager can access your declarations. If your manager changes, your new manager will be able to access your declarations.
- The content of declarations may be monitored and audited by the Department.

### **What happens to the information that I enter?**

- The content of declarations may be monitored and audited by the Department. The Department treats all personal information in accordance with *Privacy and Data Protection Act 2014 (Vic)* and the *Public Records Act 1973 (Vic)*.

### **How long declarations retained in eduPay?**

- Your declarations will remain in eduPay while you are an employee.

## **IS IT MANDATORY TO FOLLOW THIS PROCESS?**

### **When will monitoring and enforcement of the requirement to use the form start?**

- From the beginning of 2019, compliance with the requirement to use the COI declaration form will be monitored and non-compliance will be followed up with a direction to use the form.

**What will be the consequences for not using the eduPay declaration form?**

- The COI Policy requires principals, Assistant Principals, Business Managers, regional and central staff to use this form for conflict of interest declarations.
- Failure to make a declaration using the eduPay COI declaration form where required could lead to disciplinary action under the COI Policy, which states that failure to report a conflict of interest in accordance with the Policy could lead to disciplinary action.

**WHERE CAN I GET ADVICE?**

**What support will be available for users?**

The regional [Integrity Liaison Officers](#) and the [Employee Conduct Branch](#) are available to support all staff with COI queries, advice on declarations and appropriate management steps to mitigate COI risks, and questions on using the new online form.

**Where can I get more information about declaring and managing conflicts of interest?**

Support materials and COI guidance materials are accessible on the [HR Web Conflict of Interest page](#).

**Where can I get help with technical issues in using the form (including issues with declaration notification emails being sent to the wrong person)**

For any eduPay technical issues you can contact your relevant support contact from this list:  
<https://www.education.vic.gov.au/hrweb/Pages/contactus.aspx>