



CONFLICTS OF INTEREST

FACTSHEET

WHO IS COLLECTING THE INFORMATION?

Western Sydney University ("the University") is collecting the information regarding declared conflicts of interests.

WHAT IS THE PURPOSE OF THE COLLECTION?

The University has obligations to collect certain information from University employees under legislation and internal policy, including:

- [Independent Commission Against Corruption Act 1988 \(NSW\)](#) – which applies to University representatives as “public officials” and includes conflicts of interests such as improperly using knowledge or resources of the person’s position for personal gain or the advantage of others. The Vice-Chancellor, as principal officer of the University, has a duty to notify the Commission of any matter where there is reasonable suspicion of corrupt conduct (refer Part 3 of the Act).
- [Compliance Policy](#) – Through this Policy, the University is committed to complying with all laws relating to its operations and governance, and maintaining the highest standards of diligence in all areas of public accountability through its policies.
- [Code of Conduct](#) – Through this Code, the University is committed to demonstrating high standards of personal and professional conduct.
- [Conflict of Interest Policy](#) – Through this Policy, the University is committed to conducting its business and delivering higher education and research in a fair, transparent, accountable, and impartial manner that ensures public trust and confidence.

WHO HAS ACCESS TO THE INFORMATION IN THE COI REGISTER?

Western Sydney University controls and limits access to the Register, including who can enter and/or view the data stored in the Register. The University holds all data in its possession, and administers all data entered and stored in the Register in accordance with its [Privacy Policy](#) and [Privacy Management Plan](#).

Declarations submitted by University Representatives can be viewed and accessed by:

- designated officers in the Office of the University Secretary and General Counsel, Office of Strategy, Business Development and Procurement, and Human Resources.

The Register is maintained by third party vendor, **Protecht**, which administers appropriate administrative, physical, technical safeguards and disaster recovery consistent with the requirements of ISO 27001 for the protection, security, confidentiality, and integrity of the data entered and stored in the Register.

Protecht does not (a) modify, (b) disclose except as compelled by law or as expressly permitted by Western Sydney University, or (c) access the data entered and stored in the Register except to provide maintenance services, prevent or address service or technical problems, or at Western Sydney University's request in connection with customer support matters.



HOW LONG WILL INFORMATION IN THE REGISTER BE STORED?

The information in the Register will remain in the Register until the agreement between the University and Protecht is terminated (see next section).

WHEN WILL THE INFORMATION IN THE REGISTER BE DESTROYED?

Upon termination of the agreement the University has with Protecht, the data will be deleted within 30 days of the effective date of termination. A downloadable file of the stored data is made available to the University within the 30-day period. The data entered and stored in the Register will be cleansed from production and back up servers.

WHEN WILL WESTERN SYDNEY UNIVERSITY DESTROY THE INFORMATION PROVIDED FOR THE PURPOSE OF DECLARING CONFLICTS OF INTEREST?

Western Sydney University is bound by the [State Records Act 1998 \(NSW\)](#). Summary records documenting disclosures of University staff who are not governing body members are retained for 7 years. Note that using the online register does not absolve any retention requirements; the requirements still remain the same as when paper declarations were being made.

CAN I OPT OUT OF USING THE REGISTER?

Yes, you can opt out of having your declaration information entered and stored in the Register. This does not absolve the University of its legislative obligations and policy commitments, however, and a paper declaration must still be completed by you, and collected, used, and disclosed by the University in accordance with its *Privacy Policy* and *Privacy Management Plan*. Contact the Compliance Program Unit at compliance@westernsydney.edu.au.