

When do relationships amount to a conflict of interest?

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Agenda

- What is a conflict of interest?
- What is a conflict of duties?
- Why do conflicts of interest and duties need to be managed?
- The types of relationships that might be a personal interest
- Relationships that have resulted in corrupt conduct
- Key take-aways

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Today, I will be talking about relationships that can give rise to a conflict of interest. So to begin with I will briefly discuss what a conflict of interest is. Another concept I will look at is that of conflicts of duties, which carry some of the same corruption risks as conflicts of interest, particularly in relation to ensuring integrity and managing perceptions of partiality.

I will then discuss why it is important that we avoid such conflicts where possible and manage them when they are unavoidable. We will then look at a range of relationships that could result in a conflict of interest and at a test you can apply to assess a relationship to determine if a conflict of interest is likely.

I will also give you some examples where undisclosed and unmanaged conflicts of interest relating to relationships have led to corrupt conduct.

Finally, I will leave you with a few key messages and will answer any questions you might like to ask me on the topic.

**Please note: This document is an edited version of the original speech given by the Chief Commissioner at APSAC Conference 2023. Case studies in this version have been de-identified.*

What is a conflict of interest?

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There is substantial guidance available in various jurisdictions about what constitutes a conflict of interest and how to manage them.

I will be focusing on the advice the NSW Independent Commission Against Corruption provides. I would like to say that while the Commission's advice is comprehensive, it was written for the NSW jurisdiction. It is important that you and your agency abide by the legislation, code of conduct or other relevant guidelines that apply in your own context.

What is a conflict of interest?

A **conflict of interest exists** when a **reasonable person might perceive** that a public official's personal interest(s) **could** be favoured over their public duties.



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As I said, in terms of defining a conflict of interest, I will draw on the Commission's own advice publication – [Managing conflicts of interest in the NSW public sector](#). If you would like to look at it yourself in more detail, the publication can be download from our website or directly via the QR code you see on the screen.

The Commission's definition provides simple and straightforward guidance on what the disclosure threshold should be to capture the broadest range of interests that could result in conflicts of interest. Our definition sets a low bar for disclosure and a simple test for when to disclose that removes many of the excuses people use for not disclosing.

So here it is: “A **conflict of interest exists** when a **reasonable person might perceive** that a public official’s personal interest(s) **could** be favoured over their public duties.” Another way to think about it is that you will have a conflict of interest when a reasonable person might perceive that your personal interest could influence the actions you take in your official capacity.

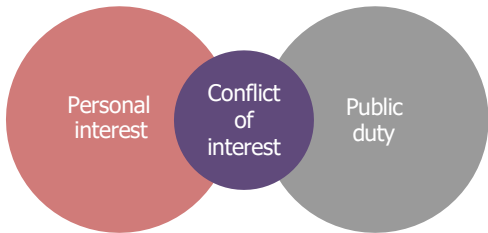
Let’s look at the definition in a little more detail.

Is it a conflict of interest?

There are four elements to consider:


1. Does the official have a personal interest?
2. Does the official have a public duty?
3. Is there a connection between the personal interest and the public duty?
4. Could a reasonable person perceive that the personal interest might be favoured?

If “Yes”, there is a conflict of interest that needs to be disclosed and managed!



The diagram consists of two overlapping circles. The left circle is red and labeled 'Personal interest'. The right circle is grey and labeled 'Public duty'. The overlapping area in the center is a darker purple color and labeled 'Conflict of interest'.

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There are four elements to consider. Four questions to answer.

Firstly, does the official have a personal interest? For example, is a friend or family member involved? Could the official personally benefit in some way? Does the public official feel some sort of enmity?

The second question to ask is, does the official have a public duty? In other words, do they have a role to play in the process? Is there some sort of exercise of discretion – some decision they have to contribute to?

Thirdly, is there a connection between the public official’s personal interest and the public duty they are expected to carry out?

And if the answer to the first three questions is “yes”, then we have to ask the fourth question: could a reasonable person perceive that the personal interest might be favoured over the public duty?

At this point, you might be wondering who this abstract “reasonable person” is. Well, it could be any fair-minded and informed individual who doesn’t have an interest in the matter themselves. For example, it could be a colleague or a member of the public.

Now, if that reasonable person might perceive that the personal interest could influence the outcome, then there is a conflict of interest that needs to be disclosed. What we will do now is look quickly at why conflicts of interest need to be managed before we move on to the main point of the presentation, which is to look at the features of a relationship that give rise to a conflict.

Conflicts of duties: Wearing two hats

"A conflict of duties exists when a reasonable person might perceive that a public official or agency has public duties that could be incompatible or in tension, or in situations where one public duty may be favoured over another."



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A related issue that is sometimes confused with conflicts of interest is conflicts of duties. The Commission recently released a [short publication on conflicts of duties](#) that you can access directly from our website or via the QR code on the screen now. The publication aims to provide guidance to public officials and agencies on identifying and handling conflicts of duties.

Managing conflicts of duties, just like managing conflicts of interest, helps to obtain and retain the trust of stakeholders and the community, and comply with the principles of probity and integrity.

You will notice that the definition is very similar to our definition of a conflict of interest:

A conflict of duties exists when a reasonable person might perceive that a public official or agency has public duties that could be incompatible or in tension, or in situations where one public duty may be favoured over another.

As a matter of interest, let's have a look at the elements of a conflict of duties.

Elements of a conflict of duties

1

The official or agency owes a duty to the affected person or entity

2

The official or agency has another duty

3

There is a reasonable concern that one of the duties may be influenced by the other

4

There is a reasonable perception that:

- an affected person or entity could be disadvantaged or improperly or unfairly advantaged by the potential interest;
- or that the public interest could be harmed or perceptions of public integrity undermined.

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There are four elements to a conflict of duty. These are:

1. that the official or agency owes a duty to the affected person or entity
2. that the official or agency has another duty
3. that there is a reasonable concern that one of the duties may be influenced by the other, and
4. that there is a reasonable perception that either:
 - an affected person or entity could be disadvantaged or improperly or unfairly advantaged by the potential interest
 - or that the public interest could be harmed or perceptions of public integrity undermined.

To make that a little more concrete, let's have a look at some examples.

Examples of conflicts of duties

A public official's conflict of duties	Regulatory duties vs other activities	Extension of conflicts of duties from a public official to an agency
A public official representing their agency on an industry board may have a duty to maintain confidentiality of board discussions and to keep their agency abreast of significant issues pertaining to the board.	An agency with a commercial division that manages NGO projects has another division that regulates the same NGO.	A public official who assists community groups to apply for grants is conflicted in assessment of those applications.

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I will talk first about the situation where a public official has a conflict of duties. For example, the public official is asked to represent their agency on an industry board. A conflict of duties can arise because they may have a duty to maintain confidentiality of board discussions on the one hand and a duty to keep their agency abreast of significant issues pertaining to the board on the other.

Conflicts of duties can also arise for a public official or authority where there are regulatory duties versus other activities. For example, an agency with a commercial division that manages NGO projects and has another division that regulates the same NGO. These duties may clash. There are also circumstances where the same person may hold two or more public offices with competing public interests.

It can be even more difficult for an individual public official who performs both a facilitating and assessment function related to the same entity. For example, a public official who assists community groups to apply for grants is conflicted if they are also expected to assess those applications.

Now that we are clear on what a conflict of duties is, it begs the question, "Can a conflict of duties morph into a conflict of interest?" The answer to that is, "Yes". Take our last example, the public official who assists community groups to apply for grants. If an affinity develops between the public official and the community group to the extent that the public official becomes captured by the interests of that group, the connection they have may become personal in nature and their judgment may be compromised. This could now be both a conflict of duties and a conflict of interest.

Why do conflicts of interest and conflicts of duties need to be managed?

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Let's look now at why conflicts of interest and duty need to be managed.

Why do conflicts of interest and duty need to be managed?

Unmanaged conflicts of interest:

1. Undermine public trust in our institutions
2. Make the conflicted public official and the agency look dishonest, even when there is no actual corruption
3. Create a vulnerability to later influence
4. Make it hard for the agency to defend itself and its staff
5. Are the motivation for much corrupt conduct

Unmanaged conflicts of duties:

1. Undermine public trust in our institutions
2. Make the conflicted public official and the agency look dishonest, even when there is no actual corruption
3. Create a vulnerability to influence by powerful stakeholders
4. Make it hard for the agency to defend itself and its staff
5. Can be leveraged to achieve a corrupt outcome

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In simple terms, leaving conflicts of interest undisclosed and unmanaged gives rise to real corruption risks, as well as perceptions of corrupt conduct. Firstly, when it comes to light that a conflict of interest has not been disclosed or appropriately managed, questions arise as to whether the related decision or process was fair or if the personal interest was favoured over the public interest. When this occurs, unsurprisingly, people start to lose faith in the government body itself and potentially government more broadly. People expect government to make fair, merit-based decisions, not decisions that favour particular people.

Even if the decision that was made ends up being the right decision, there is a very real risk that people will not trust that outcome because of the conflict of interest. The more contentious the decision, the more likely it will be that people will be looking out for any sign of unfairness. In terms of maintaining trust in government, we have to not only do the right thing but be seen to be doing so. That means identifying, disclosing and managing conflicts of interest appropriately.

Another concern is that once a public official has failed to disclose a conflict of interest, it can create a vulnerability to later influence.

When a conflict of interest is left undisclosed it can become more and more difficult to disclose it as time passes. This increases the chance that the conflict could result in corrupt influence over time. Also, the conflicted public official may become vulnerable to blackmail by an unscrupulous colleague or an outside party, such as a contractor or property developer.

When public officials fail to avoid or disclose a conflict of interest, it makes it difficult for the agency to defend itself or the conflicted staff member when allegations of corruption or other wrongdoing are made. The lack of evidence of effective conflict of interest management means that the entire related process is brought into doubt and the extent of evidence needed to prove that the decision was not tainted by the conflict of interest is more extensive than that needed to show that a conflict of interest was dealt with properly in the first place.

Depending on how good the documentation is around the process and the extent of public interest in the matter, the process could be completely derailed. By avoiding where possible, disclosing when needed and then appropriately managing the conflict of interest, the organisation has the ammunition it needs to demonstrate that both the public official and the organisation have done the right thing and that the decision is sound.

Finally, and most obviously, conflicts of interest are a common motivation for much of the corrupt conduct that occurs. In one sense, all corrupt conduct is carried out in someone's personal interest, regardless of the type of corruption it is or who is involved. The challenge we have is that when people are intent on furthering their personal interest in a corrupt way, they will not comply with conflict-of-interest disclosure and management requirements.

So that begs the question, "If those intent on acting corruptly won't comply with conflict-of-interest rules, is there any point in having them at all?" The answer to that is a resounding, "YES!"

By setting standards around conflicts of interest, we are making a clear statement about how the public expects us to behave and how important it is that we meet or exceed that standard. It helps to build trust in our institutions and makes those we engage with more confident that they will be treated fairly. It creates an environment where it is more obvious to people when a colleague or a contractor has a conflict of interest and creates a culture that will not put up with undisclosed and unmanaged conflicts of interest. It empowers people to speak out. It helps people to do the right thing when they would otherwise not be sure what that is and when people deliberately fail to comply, it gives the agency a disciplinary option for dealing with the transgression.

So, while a disclosure and management regime will not stop all corrupt conduct that arises out of favouring a personal interest, such a regime makes it clearer what is acceptable, gives people the tools they need to manage conflicts well and a disciplinary option as a deterrent and response. For those truly committed to furthering their own interests, other preventative and detective controls need to be in place to address systemic weakness and corruption opportunities.

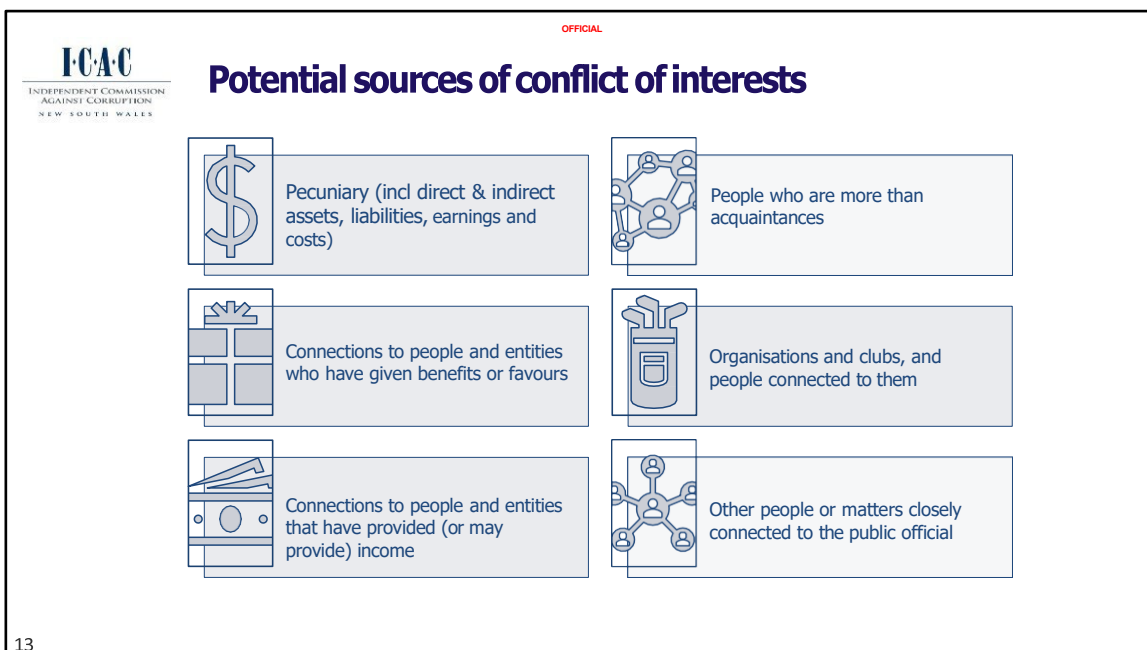
Just like unmanaged conflicts of interest, unmanaged conflicts of duties can:

1. undermine public trust in our institutions
2. make the conflicted public official and the agency look dishonest, even when there is no actual wrongdoing
3. create a vulnerability to influence by powerful stakeholders that can result in unfair and potentially corrupt outcomes
4. make it hard for the agency to defend itself and its staff against allegations of favouritism, and
5. can be leveraged to achieve a corrupt outcome.



So, now let's start looking at the kinds of relationships that can, and often do, give rise to conflicts of interest. I want to start with some of the more obvious and common ones and then we will move onto the more nuanced ones.

One of the reasons for going into detail here is that we do see people failing to recognise a conflict of interest and, consequently, it not being disclosed or inadequately disclosed. Also, some people we have investigated have claimed that they did not have a conflict of interest due to a misguided view of the types of relationships that amount to a personal interest. Clarity here can be helpful for those trying to do the right thing and make it harder for those who want to further their interests by pretending they do not have a personal interest in a matter.



In working out what relationships may or may not give rise to a conflict of interest, it can be helpful to look at common sources of a conflict.

Pecuniary interests

These are your financial interests and those of your spouse, children, immediate family or a business partner – they involve direct or indirectly held assets, liabilities, earnings and costs. They can involve gains or losses, loans, debts, property or shares, et cetera.

People who are more than acquaintances

This again can be family, friends and other associates. It can also be people for whom the public official feels enmity towards. Shortly, I will talk about what you can consider to work out if someone is more than an acquaintance.

Connections with people and entities who have given benefits or favours

Conflicts of interest arise here because receiving a benefit or favour can place a public official in a position of social obligation that may be called upon in the future. It is a tactic used to groom public officials and to place the official in a compromising position, which can be used to blackmail them in the future. When benefits are provided with the intent of improperly influencing a public official, these benefits can amount to bribes. As an example, in [Operation Galley](#) the Commission found that three councillors at a local council had a personal relationship with a property developer, from whom they received free overseas travel and hospitality. They were effectively groomed by the developer to support his property development interests. The developer also secretly videoed two of the councillors with young women, exposing them to the possibility of blackmail.

Organisations and clubs, and people connected to them

Organisations and clubs can be the focal point of community activity. The relationships that develop can be strong and enduring. A sense of connection and belonging, of mutual effort towards a common purpose can create influential relationships.

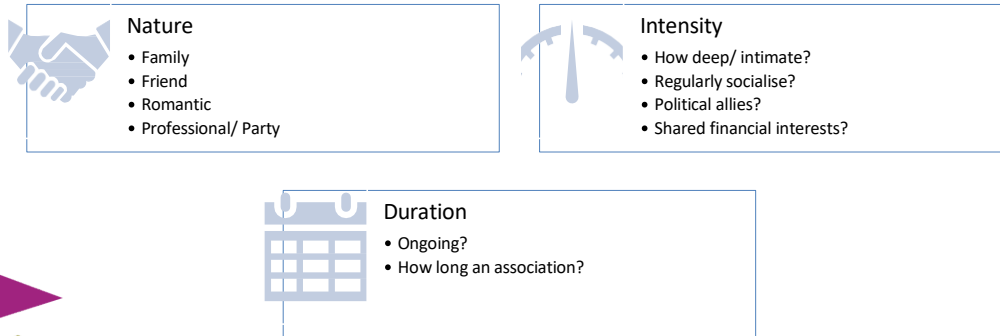
Connections to people and entities that have provided (or may provide) income

This may be past employers, possible future employers, past or current business partners or providers of contract work. In past investigations, we have seen consultants provide advice that steers government procurement towards a company for whom the consultant has also done work. For example, [Operation Vesta](#) where the Commission found that a senior executive of the Sydney Harbour Foreshore Authority acted in conflict with his official duties when dealing with lessees of properties owned by the authority at a time when the executive anticipated being involved in private business with the lessees in the UAE and received \$11,170 from them for flight and accommodation expenses when working towards the establishment of such a business.

Other people or matters closely connected to the public official

This category includes anything else that might give rise to a personal interest. This could include social media associations. The Commission's view is that a routine online or social media connection, in the absence of any hallmark of a friendship, may not necessarily amount to a personal interest.

Acquaintances or personal relationship?



Just knowing someone will not necessarily amount to a personal interest, but any relationship with a person who is more than an acquaintance could amount to a personal interest. In circumstances where it is not clear if there is a personal interest or not, this is what we consider.

Firstly, what is the nature of the relationship? Clearly if the public official is dealing with a matter linked to a family member, a close friend or an intimate partner, that is a personal relationship and a conflict of interest. But what if the relationship is primarily professional and centres around professional activities that occur within a workplace or in dealings with a supplier, contractor, property developer or grant applicant, for example? Well, the answer is not so clear and we need to look further.

Here we need to consider how deep or intimate the relationship is. Certainly, socialising outside the work environment can indicate that a relationship has become personal, but socialising is not the only measure. For example, people who work closely together to achieve a professional outcome can develop a strong bond based on shared purpose, mutual trust and reliance. This can certainly amount to a personal relationship that involves little or no socialising outside the work context. We also look for things like shared financial interests and political alliances.

It is also helpful to consider the duration the relationship. An ongoing relationship or one of long standing can evolve into a friendship or just appear to do so. In either case, a personal relationship is more likely to develop when the connection is ongoing and it can certainly appear to an observer that a personal relationship exists.

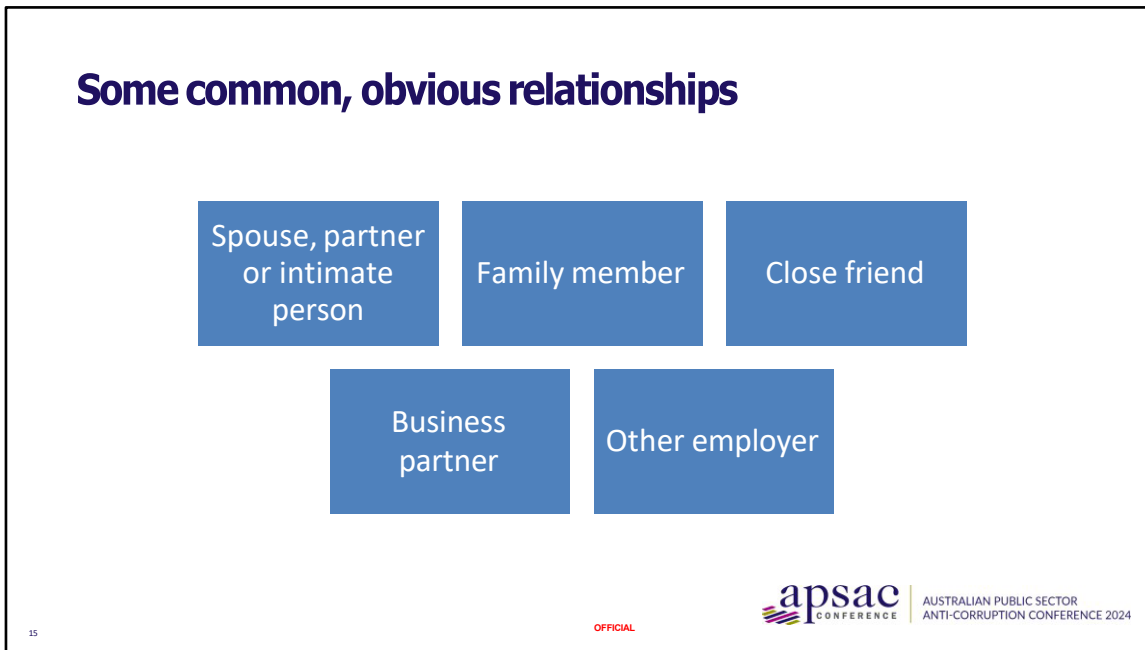
If we were to apply this test to the relationships between the developer and the three councillors I spoke about earlier, it is clear that their nature, depth and duration were such that the developer was able to influence the councillors to his benefit.

There are other sources that explore the line between personal connections/associations and personal interest. These include:

- The Victorian Public Sector Commission's guide to [managing consensual personal relationships](#). It applies to Victorian public service organisations but is useful as it includes definitions and advice.
- The Canadian Conflict of Interest and Ethics Commissioner considered the definition of

“friend” for the purposes of their Conflict of Interest Act. [The Watson report](#) in 2019 described it as “a person with whom one has some history of mutual personal regard beyond simple association”. In broad terms, that definition is like the application of this test, that friendships are more than just acquaintances.

For more detailed information on how we distinguish between acquaintances and personal relationships, I would encourage you to look at an article on the subject in the Commission’s June Newsletter – [Corruption Matters](#), available from our website.



Following on from the previous slide, I think there will be little contention over the idea that the relationships shown here could influence a public official in the conduct of their duties. Just to illustrate this, I will give you an example.

In [Operation Ember](#), an investigation into the awarding of Roads and Maritime Services (RMS) contracts, the Commission found that an RMS employee engaged in serious corrupt conduct by misusing his position as manager of the RMS Heavy Vehicle Programs Unit to award six contracts to an engineering company. He went on to obtain for that company the exclusive NSW distributorship of the existing brand of portable weigh scales and parts used by RMS. He awarded these contracts to benefit himself and the owner of the engineering company. The owner was a school friend of the RMS manager and they also previously worked together. Their relationship was close and of many years’ standing. Further, the RMS manager misused his position to benefit himself and a friend by awarding a number of scoping and field studies to a consulting company. This company was owned by another person with whom he had previously worked – again a friendship of many years’ standing. This is not the full extent of the corrupt conduct we found during this investigation, but it does demonstrate how a conflict of interest arising out of a friendship can lead to significant corrupt conduct.

Some less straight-forward relationships



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Some relationships we have as public officials may be a little less straightforward and require greater consideration.

We have already touched upon club membership, but to take that a little further, if the public official happened to be a club board office-bearer, then they would have a duty to the club that goes beyond that of a regular member. If the public official were then involved in a process affecting the club, they would have two duties – one to the public interest and one to the club, amounting to a conflict of interest that must be disclosed and managed so that the public interest is served. Even as a regular member of a club, peer pressure could be placed on a public official to exercise their duties to benefit the club or a fellow club member.

When a public official is also a member of a particular community, this can result in perceptions of partiality. Social pressure can also be applied to influence the official into favouring the community or a community member. This is particularly of concern when the public official is actively engaged in their community personally, while also performing public duties in relation to that community.

As an example, in [Operation Lancer](#) the Commission investigated an allegation that staff at a TAFE favoured the sourcing of software systems from a particular company in return for corrupt rewards. Some of the key players in the corrupt conduct knew each other through a local migrant community. These included the then manager of finance and administration services and the then manager of budget performance at the TAFE. These men had known each other for many years prior to the latter's appointment. A director of the favoured company was also known to them through the community.

In addition to the favourable treatment of the company, the Commission found that the finance and administration services manager assisted the budget performance manager with his job application and sat on the interview panel. He did not disclose his relationship with this individual, who described him as his "family friend", "local guardian" and "mentor". Clearly this was the type of relationship that could give rise to a conflict of interest and should have been disclosed.

Both individuals also assisted an applicant in obtaining a contract role at the TAFE. The budget performance manager also knew the applicant through the migrant community he was a part of, and sent an email to the finance and administration service manager's personal email address with the applicant's resume attached, asking him (in their community's language) to review the resume for a role at the TAFE, as he was not sure what needed to be added to it. The finance and administration services manager reviewed the resume and adjusted it. The budget performance

manager acted as a referee supporting the work experience added to the resume. The applicant received the contract. He later obtained more work with the two men's assistance. In that case, the budget performance manager was the convenor of the interview panel and the finance and administration services manager provided a reference and was the approving delegate.

Similarly to community connections, the extent to which a person is politically active in either a political party or another politically oriented organisation can generate conflicts of interest, as can religious affiliations, charities and causes, as well as membership of professional associations and unions.

In rural and regional areas in particular, public officials often have to deal with the same local businesses, local non-government organisations and local community groups that run events or provide services that benefit from government funding. One of the challenges in regional areas is that there is often a tight-knit community, with pre-existing kinship connections, friendships and enmities that can result in a conflict of interest.

When thinking about all these relationships, particularly in tighter-knit communities, the extent of personal interests that could influence the public official can feel overwhelming. This is why agencies need to have clearly defined and described methods for addressing the issue within their own context.

Many of the relationships we have looked at so far are primarily social in nature and arise out of family, friendship or community connections. Some are very clear, and some require a more detailed assessment to determine the real risk, but all are such that a reasonable person might think that the public official could be influenced by the relationship. These should be disclosed and managed based on the level of risk in each case.

There are some other types of relationships that fall outside the obvious, where the nuances of those relationships need to be understood to determine if a conflict of interest exists. Here are some examples from past investigations.

The first type of relationship I would like to talk about is one that arises out of frequent professional contact. This is where a relationship develops between a public official and a person they are dealing with that goes beyond a cordial working relationship and develops into a closer connection, such as a friendship, a business arrangement or a romance. The nature, depth and duration of these relationships, even if they do not appear to be a typical friendship, are such that a conflict of interest arises. The contexts in which such relationships can develop may be in the areas we commonly see corrupt conduct, such as procurement and contract management, recruitment, and regulatory functions – particularly when the two parties are working closely with each other on projects or have frequent contact. Conflicts of interest can easily arise in these circumstances and, when left unmanaged, can lead to manipulation, improper influence and corrupt conduct.

In [Operation Atlas](#), the Commission investigated a council town planner who wanted to ingratiate herself with property developers she dealt with in the hope of developing a post-employment business. She regularly met with developers, friendships and intimate relationships formed, and she received expensive gifts. She used her position to further the interests of certain developers by favourably assessing their applications. This issue was exacerbated by the fact that the director of planning at the council had frequent contact with one of the same property developers himself. They had common interests and evidence showed that a friendship developed. This conflict was neither declared nor managed. The director of planning was influenced by this relationship and did nothing to prevent the town planner from assessing the development applications of the property developer with whom she had an intimate relationship.

The second type of relationship I would like to focus on is that of a friendship that arises out of a

long-standing professional rather than social relationship.

In the case of a former minister and a former union official in [Operation Acacia](#), evidence before the Commission indicated that their relationship developed through their professional activities within their political party and that – while it was not primarily a social relationship – a mateship developed between the two men, indicative of an enduring friendship of the comradely kind. It involved trust, reliance and support when needed. These sorts of relationships can also create a sense of indebtedness that can influence decisions. In other words, a close and influential relationship can arise in a professional setting without the relationship being primarily or initially of a social nature, but rather related to working together to further often legitimate professional goals. The conflict of interest moves into corruption, of course, at the point where that relationship gives rise to influence or attempts to influence a public official in the discharge of their duties – as was the case when the minister granted a mining exploration licence to the union official that he would not have otherwise granted.

In [Operation Jasper](#), our investigation into the granting of a coal exploration licence by the abovementioned minister over a property in which a parliamentary colleague had an interest, the Commission found that they both had a close personal connection which arose from the close working relationship they developed within their political party. The minister came to depend on this colleague for advice and support. Testimony given to the Commission showed that the parliamentary colleague frequently supported the advancement of the minister within the party and into the ministry. The Commission's view was that this became a form of patronage and that the minister was capable of being influenced by this colleague to act in inappropriate ways that would benefit them.

In [Operation Keppel](#), a member of Parliament had a close friendship with another individual, whom he said he met at a networking function in 2002. They had a mutual relationship of trust in both directions. The latter had been appointed executor of the MP's will. He was involved in construction and property development. The MP used his position as an MP to provide assistance to the other person in a number of ways. These included providing information to them that came to him in his capacity as an MP, making representations to ministers and ministers' staff to assist with planning applications being approved, and organising meetings for the individual or his staff with public officials to discuss site-specific details, knowing that site-specific discussions shouldn't take place at such meetings.

In [Operation Hector](#), the Commission investigated the awarding of contracts at Transport for NSW and a local council. I am not going to talk about the investigation in great detail now, but an interesting element is the relationships between one of the main players, and a university friend, and three others whom he met while working on a TfNSW project. The main player became involved with several companies related to these men and – while employed at council – favoured these companies by allocating contracts to them to benefit himself and his associates.

Key messages

- Conflicts of interest or duties should be avoided where possible and disclosed where unavoidable
- The trigger for disclosure of a conflict of interest or duties is the reasonable person's perception of possible influence
- Management is essential to protect the public interest and public trust in government
- A relationship can be personal even if there is little or no socialising. It's the nature, intensity and duration that need to be considered



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As you can see from the examples we have looked at today, unmanaged conflicts of interest and conflicts of duties can cast doubt on the integrity of public authorities and raise concerns of unfairness and corruption.

They need to be avoided where possible and disclosed and managed where they are unavoidable.

The trigger for disclosure of a conflict of interest or duties is the reasonable person's perception of possible influence.

Management is essential to protect the public interest and public trust in government, but we also need to have other prevention and detection measures in place for when people choose to favour their personal interests.

There is a wide range of relationships that can amount to a personal interest and a conflicts of interest. A relationship can be a personal interest even when it does not arise out of family or friendship connections, and socialising is not an obligatory element. It's the nature, intensity and duration of the relationship that needs to be considered.

Thank you for your attention and I would be happy to answer any questions you may have.

(Ends.)