1. Purpose
This procedure supports NSW Health Pathology staff to identify, avoid, declare, manage and document conflicts of interest and notify gifts and benefits.

2. Background
NSW Health Pathology is committed to a culture of ethical behaviour, accountability and transparency. The NSW Health Conflicts of Interest and Gifts and Benefits Policy Directive PD2015_045 provides guidance for the identification, notification and management of conflicts of interest and gifts and benefits to protect the integrity of the public health system and its staff. It defines the position for NSW Health Pathology in relation to conflicts of interest and gifts and benefits.

3. Scope
This procedure is mandatory and applies to all NSW Health Pathology staff.

4. Definitions
The definitions in this document are consistent with the definitions in the NSW Health Conflicts of Interest and Gifts and Benefits Policy Directive PD2015_045.

5. Procedure
5.1 Conflicts of Interest
Staff must declare immediately all conflicts of interest to their manager, via the NSW Health Pathology Conflict of Interest register as outlined in the NSW Health Conflicts of Interest and Gifts and Benefits Policy Directive PD2015_045 Clause 3 Identifying and Declaring a Conflict of Interest.

Where circumstance inhibits the immediate provision of a written declaration, staff must make a verbal declaration to their manager or relevant manager present, and must, as soon as possible, record their declaration via the NSW Health Pathology Conflict of Interest Register.

5.1.1 Secondary Employment
All NSW Health Pathology staff, including permanent, temporary, contract or casual staff, must seek approval for secondary employment including business interests or undertakings.

a. Staff must complete the Other Employment Form and submit this to their manager
b. Should a conflict of interest be identified staff must then make a declaration using the NSW Health Pathology Conflicts of Interest Register.

5.2 Gifts and Benefits
Staff should not seek or accept any payment, gift or benefit intended or likely to influence, or that could be reasonably be perceived by an impartial observer as being intended or likely to influence, staff as outlined in NSW Health Conflicts of Interest and Gifts and Benefits Policy Directive PD 2015_045 Clause 2 Gifts and Benefits. Gifts and benefits are not accepted from commercial organisations.

a. Staff must seek advice from their manager prior to accepting a gift or benefit
b. Staff must declare all offers/receipt of gifts or benefits to their manager via the on-line NSW Health Pathology Gifts and Benefits Register and

c. Staff may in the first instance provide a verbal declaration to their manager, this must be followed by completing a declaration via the NSW Health Pathology Gifts and Benefits Register.
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Conflicts of Interest and Gifts and Benefits
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6. Roles and Responsibilities

Roles and responsibilities are detailed in the NSW Health Conflicts of Interest and Gifts and Benefits Policy Directive PD2015_045 for the Principal Officer, Managers and Supervisors, Chief Audit Executive and Staff.

7. Legal and Policy Framework

Ministry Policy Documents

1. NSW Health Conflicts of Interest and Gifts and Benefits Policy Directive PD2015_045
3. NSW Health Sponsorships Policy Directive PD2005_415

Ministry Fact Sheets


NSW Health Pathology Supporting Documents

1. NSW Health Pathology Conflict of Interest Form
2. NSW Health Pathology Gifts and Benefits Form

Other Guidelines and Fact Sheets

1. NSW Public Service Commission Behaving Ethically: A guide for NSW government sector employees
2. NSW Audit Office 2.2.1 Potential Conflicts of Interest
3. NSW Ombudsman Fact Sheet - Recognition and Managing Conflict of Interests
4. NSW Ombudsman Public Sector Agencies Fact Sheet No. 3 – Conflict of Interests
5. NSW Ombudsman publication – Good Conduct and Administrative Practice (2nd edition) 2006

8. Review

This procedure will be reviewed by 31 December 2018.

9. Risk

<table>
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<tr>
<th>Risk Statement</th>
<th>There is a risk that if our staff fail to declare a conflict of interest or gift and benefit associated with their role as a public official NSW Health Pathology will experience a loss of public confidence.</th>
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</thead>
<tbody>
<tr>
<td>Risk Category</td>
<td>Leadership and Management</td>
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10. Further Information
For further information, please contact:

<table>
<thead>
<tr>
<th>Policy Sponsor</th>
<th>Position: Director Corporate Strategy Systems and Support</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Name: Vanessa Janissen</td>
</tr>
<tr>
<td></td>
<td>Telephone: 02 4920 4000</td>
</tr>
<tr>
<td></td>
<td>Email: <a href="mailto:Vanessa.Janissen@health.nsw.gov.au">Vanessa.Janissen@health.nsw.gov.au</a></td>
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11. Version History
The approval and amendment history for this document must be listed in the following table.

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<tr>
<th>Version No</th>
<th>Effective Date</th>
<th>Approved By</th>
<th>Approval Date</th>
<th>Risk Rating</th>
<th>Sections Modified</th>
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<td>1.0</td>
<td>22/12/16</td>
<td>Director Corporate Strategy Systems and Support</td>
<td>22/12/16</td>
<td>Medium</td>
<td>This procedure has been updated to enable declarations of conflicts of interest and gifts and benefits via the NSW Health Pathology electronic register.</td>
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<tr>
<td>2.0</td>
<td>02/02/17</td>
<td>Director Corporate Strategy Systems and Support</td>
<td>02/02/17</td>
<td>Medium</td>
<td>New Conflicts of Interest and Gifts and Benefits Forms have been approved.</td>
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