



APS Conflict of Interest Management Framework: Better Practice Model

Frequently asked questions

What is the purpose of the Better Practice Model?

The APS Conflict of Interest Management Framework: Better Practice Model is the APS response to recommendation 14 of the [Louder than Words: An APS integrity action plan](#) that *“the Chief Operating Officers’ Committee review [agency] conflict of interest management frameworks from a risk mitigation perspective with a view to...share good practice and establish:*

- *Clear conflict of interest management policies and processes, including conflicts of interest arising in the context of previous employment, outside employment and post-separation employment (the ‘revolving door’).*
- *Specific processes for declaring and managing the actual, potential or perceived conflicts of interest of agency heads and SES officials, particularly after they leave the APS.*
- *Regular, scenario-based training and guidance for staff at all levels on how to identify, declare and, most importantly, manage and monitor conflicts of interest to uphold integrity.*
- *Centrally-recorded conflict declarations and conflict management plans within agencies, with monitoring and assurance processes in place.”*

The Better Practice Model provides operational guidance and practical information to support APS agencies to implement effective conflict of interest processes and policy arrangements for their employees, tailored to the nature of each agency’s responsibilities, and risk appetite.

The basis for the model is to clearly articulate the elements of effective conflict of interest management for APS employees by identifying ‘*minimum requirements*’, ‘*good practice*’ and ‘*excellent practice*’ for agencies to support them to meet their legal and ethical obligations under relevant legislation.



Under the model, agency policies, systems and processes should focus on:

- Declaration and management plan requirements
 - identification of material personal interests
 - assessing risk of real or apparent conflicts of personal interests with public duties
 - conflict mitigation or management strategies
- Consideration of conflicts of interest arising from:
 - Previous employment
 - Secondary (Outside) employment
 - Post-separation employment
 - Other official duties
 - Other agency operations
- Scenario-based training for employees
- Centralised recordkeeping
- Monitoring, reporting and other assurance activities
- Oversight responsibilities

Agencies can use the model to evaluate their current conflict of interest policies, systems and procedures, to strategically prioritise efforts to strengthen their existing arrangements.

Is the model applicable to all APS agencies?

The model is designed for use across all APS agencies to assist in developing, strengthening and maintaining effective conflict of interest management by APS employees. The model aligns with requirements for APS employees and agency heads under the APS Code of Conduct within the *Public Service Act 1999*.

It also enables employees and agency heads to meet their associated duties as public officials under the *Public Governance, Performance and Accountability Act 2013* and prevent corrupt conduct as defined in the *National Anti-Corruption Commission Act 2023*.

The model applies to all APS employees regardless of their APS engagement type (ongoing, non-ongoing or casual).

The model may also be applied to the management of non-APS personnel - contracted service provider personnel and labour hire staff - where it aligns with relevant enterprise risk controls, including where ethical obligations of those staff are enforceable through the Supplier Code of Conduct.



How should APS agencies assess their existing conflict of interest arrangements against the model?

An 'Agency Self-Assessment Checklist' has been created for agencies to compare their current conflict of interest policy and systems against the 3 maturity levels in the model to assist in identifying strengths and gaps, and inform business improvements.

The Checklist is to be used as a guidance tool, acknowledging that some agencies will have different risk appetites that may require either 'good' or 'excellent' practice against some components, whereas other agencies may determine the achievement of minimum requirements is appropriate given their context and portfolio responsibilities.

The Checklist will be made available to agencies directly via the Chief Operating Officers' Resource Hub.

Should all APS agencies aim for 'excellent practice'?

Not necessarily. Against each element of the model, agencies should consider what is the appropriate and proportionate approach based on their operating context, responsibilities, enterprise risk assessment and the level of investment required to achieve each tier of practice.

Against some elements, agencies may be satisfied with maintaining minimum practice requirements, if the associated residual risks are well understood, effectively managed, consistent with the agency's risk appetite and their staff are sufficiently supported to meet their legislative obligations.

Other agencies' functions may require the application of consistent 'good' or excellent' practice for some or all elements, particularly where the agency's responsibilities relate to integrity oversight, security, legal compliance or regulatory functions.

Some agencies may require different standards within their agencies. For example, higher standards may be appropriate for employees who require access to confidential, sensitive or protected information to perform their duties.

In putting people and business at the centre of policy, services and delivery, agencies and employees may also require close engagement and partnerships with communities and stakeholders. Navigating and effectively managing conflict of interest risks that can arise in these contexts—in a culturally capable and psychologically safe way—is essential to building trust and confidence in the APS.

Will APS agencies be independently benchmarked or required to report on their maturity assessment or compliance against the model?



At this stage, there is no requirement for agencies to report on their assessment or compliance against the model.

Agencies are nevertheless encouraged to consider opportunities to strengthen their maturity in the management of conflicts of interest while maintaining a proportionate approach in line with the agency's current risk appetite.

The Commission's [Integrity Metrics Resource](#) includes 'Monitoring and reporting on conflict of interest declarations and management plans' as a viable integrity metric, and agencies can use the benchmarks in that resource to guide their maturity uplift approach.

The approach to the development of the model is also consistent with the NACC's [Commonwealth Integrity Maturity Framework](#) and has been informed by the [performance audit recommendations and insights](#) from the Australian National Audit Office.

How does the model integrate with other conflict of interest guidance for Commonwealth public officials?

The Better Practice Model is designed to complement related initiatives and guidance including:

- [Department of Finance Resource Management Guidance 208: Management of Conflict of Interest and Confidentiality](#). This guidance has been developed to support the management of conflict of interest and confidentiality issues in relation to external entity and personnel engagement, including in the context of procurements, grants, and other financial arrangements.
- Guidance from the National Anti-Corruption Commission [Corrupt conduct and conflicts of interest: A guide for public officials](#).
- The Australian Public Service Commission's consideration of a balanced approach to managing post-employment conflicts of interest for Agency Heads, SES and designated APS positions as part of the second phase of APS reform initiatives.
- The Department of Finance's [Supplier Code of Conduct](#) developed in response to the *Louder than Words Action Plan* recommendation 13 – Strengthen the integrity of supplier conduct.
- The APS [Charter of Partnerships and Engagement](#) which sets out principles for improving the way the APS puts people and business at the centre of policy, implementation and delivery, including transparency and accountability about conflict of interest risk management within partnerships and engagements, and related decision-making processes.

How does the model intersect with reporting obligations to the National Anti-Corruption Commission (NACC)?



All employees and members of the public can report suspected serious or systemic corruption to the NACC. The Better Practice Model supports and is consistent with the NACC mandatory reporting requirements for Agency Heads.

The reporting channels recommended in the Better Practice Model are intended to indicate:

- internal methods for individuals to raise ethical concerns
- processes for leaders to monitor agency system performance, and
- available external sources of conflict of interest management advice.

What other resources will be available for agencies?

Additional supporting guidance will be made available directly to agencies through the Chief Operating Officer's Committee Resource Hub on [APS Learn](#). This provides a secure space for agency integrity practitioners to share best practice resources and learn from each other.

Resources available on APS Learn will include:

- An 'Agency Self-Assessment Checklist' against the 3 maturity levels of the Better Practice Model.
- A model conflict of interest policy which APS agencies may wish to use, and can tailor to their operating context.
- Templates for employee offboarding communications in the management of potential post-separation conflict of interest risk.
- Agencies are also encouraged to share their best practice conflict of interest resources with each other through the COO Resource Hub.

What APS-wide conflict of interest training is available?

The Australian Public Service Commission provides a variety of integrity training offerings through the APS Academy and on the [APS Learn](#) platform, including dedicated components on managing conflicts of interest, preventing fraud and corruption risk, and other integrity and ethics issues.

These include:

- [APS Foundations: Integrity in the APS](#) e-learning module
- [APS Leadership Edge](#) program for EL2s
- [SES Integrity Masterclass](#) program
- [ATO Villain Academy](#) resource
- [Introducing the National Anti-Corruption Commission](#) e-learning module.



Where can employees or agency practitioners get specific conflict of interest management advice?

If you need advice on a conflict of interest matter, you should **firstly** contact your internal team responsible for your agency's conflicts of interest policy.

The APSC's [Ethics Advisory Service](#) is also available to all APS employees in their individual capacity—and in the context of manager, HR or integrity practitioner roles—to seek advice to support decision-making on ethical issues that occur in the workplace, including identifying, avoiding, disclosing or managing conflicts of interest.

Employees can contact the Ethics Advisory Service on (02) 6202 3737 Monday-Friday from 9.00 am to 5.00 pm AEST/AEDT or by emailing ethics@apsc.gov.au.