

Policy Statement



Trans Tasman Radiation Oncology Group
ABN: 45 132 672 292
PO Box 88, Waratah, NSW, Australia, 2298
Telephone: +61 (0)2 401 43911 Fax: +61 (0)2 401 43902
trog@trog.com.au
trog.com.au

Conflict of Interest

Document Number:	TPS C5	
Version:	6	
Effective date:	12 th August 2026	
Number of pages:	9	
Summary:	This policy establishes TROG Cancer Research's approach to identifying, disclosing, assessing and managing interests and actual, potential or perceived conflicts of interest across the organisation.	
Author:	Chief Executive Officer	
Applies to:	This policy applies to all persons participating in TROG governance, employment, research, scientific, advisory, assessment or decision-making activities via a TROG group. For the purposes of this policy, a "TROG group" includes any committee, subcommittee, working party, special interest group, other advisory or decision-making body established or convened by TROG.	
Approved by:	TROG Board	
Revision Chronology:	Vs 1	New Policy
	Vs 2, 24 Sep 2008	Update to Corporations Act & relevant processes
	Vs 3, 09 Aug 2013	Update to reflect change in internal TROG procedures for managing conflicts of interest.

Vs 4, August 3 2018	Update to include staff and risk register inclusion
Vs 5, May 2022	Update to include details for TROG Board and references to the Australian Institute of Company Directors.
Vs 6, Aug 2026	Full policy review and rewrite to establish an organisation-wide framework for disclosure and management of interests and conflicts of interest.

CONTENTS

1.0	BACKGROUND	3
2.0	DEFINITIONS	3
2.1	Interest	3
2.2	Conflict of interest.....	3
2.3	Types of conflict	3
3.0	INTEREST AND CONFLICT OF INTEREST EXAMPLES	4
4.0	PROCESS FOR DISCLOSURE OF INTERESTS AND CONFLICTS OF INTEREST	4
4.1	General obligation to disclose.....	4
4.2	Initial and annual declarations	4
4.3	Meeting declarations	5
4.4	Decisions outside formal meetings	5
4.5	TROG Board Disclosures	5
4.7	Records and COI Register	6
5.0	PROCESS FOR MANAGING CONFLICTS OF INTEREST.....	6
5.1	General principles	6
5.2	TROG Board	6
5.3	TROG Committees, Working Parties, Special Interest Groups and other decision making TROG groups.....	7
5.4	Employees	7
5.5	Institutional conflicts of interest.....	8
6.0	FAILURE TO DISCLOSURE OR APPROPRIATELY MANAGE A CONFLICT OF INTEREST	8
7.0	REFERENCES & RESOURCES	9

1.0 BACKGROUND

Sound governance and transparent decision-making are critical to maintaining the integrity and reputation of TROG Cancer Research. TROG's research, scientific, governance and operational activities rely on decisions being made fairly, objectively and in the best interests of TROG and its research mission.

Conflicts of interest can arise across many TROG activities, including research development and prioritisation, scientific review, trial oversight, committee appointments, grants and funding, publications, partnerships, sponsorship, procurement and allocation of TROG resources.

Consistent with the Australian Code for the Responsible Conduct of Research, the National Statement on Ethical Conduct in Human Research and TROG's governance obligations, this policy establishes a consistent approach to the disclosure and management of interests and conflicts of interest across TROG.

TROG seeks to promote a culture of transparency and disclosure. Having an interest or conflict of interest does not necessarily indicate wrongdoing and many conflicts can be appropriately managed. The important requirements are that relevant interests are disclosed, assessed and managed appropriately.

2.0 DEFINITIONS

2.1 Interest

An interest is any personal, professional, academic, financial, commercial, institutional or other interest, relationship, responsibility or duty that may be relevant to a person's role or a matter being considered by TROG.

An interest is not necessarily a conflict of interest. Disclosure allows TROG to determine whether the interest creates a conflict and whether any management action is required.

2.2 Conflict of interest

A conflict of interest arises where an individual's interests, relationships or other responsibilities conflict, may conflict, or could reasonably be perceived to conflict with their responsibilities to TROG or their ability to exercise independent judgement in relation to a TROG activity or decision.

A conflict may be financial or non-financial and may arise from direct or indirect interests, including relevant interests of a close family member or associate.

2.3 Types of conflict

Conflicts of interest may be:

Actual – a conflict currently exists between an individual's TROG responsibilities and another interest or responsibility.

Potential – circumstances exist that could give rise to a conflict in the future.

Perceived – a reasonable person could perceive that an individual's judgement or actions may be influenced by another interest or responsibility, whether or not this is actually the case.

Actual, potential and perceived conflicts should all be disclosed and appropriately considered.

3.0 INTEREST AND CONFLICT OF INTEREST EXAMPLES

Relevant interests and conflicts of interest may arise from financial, commercial, professional, academic, institutional or personal circumstances.

Examples include where an individual:

- has a financial or commercial relationship with an organisation that may benefit from or be affected by a TROG decision;
- has received consultancy fees, honoraria, research funding, travel support or other benefits relevant to a matter under consideration;
- has an ownership, equity, intellectual property or other financial interest relevant to a matter;
- is an investigator, Trial Chair or other member of a study being reviewed, prioritised, funded or otherwise considered by TROG;
- is involved in a competing trial, research proposal, funding application or research programme;
- has a professional or academic interest in a particular outcome, including where the outcome could materially affect their own research, appointment, publication or professional standing;
- holds a position or responsibility with another organisation whose interests may be affected by a TROG decision;
- is involved in considering their own appointment, funding, award, proposal, publication or other benefit;
- has a close personal, family or professional relationship with a person directly affected by a decision;
- has responsibilities to another organisation that may conflict with their responsibilities to TROG; or
- has any other interest or relationship that could reasonably be perceived to influence their judgement.

These examples are not exhaustive. An individual should disclose an interest where there is reasonable uncertainty about whether it may be relevant.

4.0 PROCESS FOR DISCLOSURE OF INTERESTS AND CONFLICTS OF INTEREST

4.1 General obligation to disclose

Individuals covered by this policy are responsible for disclosing relevant interests. Individuals are not expected to determine conclusively whether an interest constitutes a conflict of interest before disclosing it.

Where there is uncertainty, the interest should be disclosed and the appropriate Chair or TROG officer will determine whether a conflict exists and whether management action is required.

4.2 Initial and annual declarations

Board Directors and members of TROG committees, Working Parties, Special Interest Groups and other standing TROG groups must disclose relevant interests:

- on appointment or commencement in the role;
- annually while continuing in the role; and
- whenever a relevant interest arises throughout the year and is relevant to a meeting or decision, it must be disclosed at the beginning of the meeting or decision making process

TROG may use a standard declaration form or electronic process for these disclosures.

Disclosures which are not recorded on the annual register may also be made verbally at the beginning of a relevant meeting or decision making process, and must be minuted.

Annual declarations are intended to provide a baseline record of relevant interests and do not replace the requirement to disclose interests relevant to a particular matter when it arises. Such disclosures may be made verbally and noted in the minutes of the relevant meeting.

4.3 Meeting declarations

Declaration of interests and conflicts of interest must be a standing agenda item at the commencement of meetings of all TROG governance, scientific, advisory and decision-making groups.

At each meeting, members must disclose:

- any new or changed relevant interest; and
- any interest relating specifically to a matter on the agenda.

A member must also disclose an interest if it becomes apparent during consideration of a matter, even if it was not identified at the commencement of the meeting.

The minutes must record the declaration and, where relevant, how the interest or conflict was managed.

4.4 Decisions outside formal meetings

The same disclosure requirements apply to TROG activities undertaken outside a formal meeting, including electronic or out-of-session decisions, proposal assessment, peer review, grant or award assessment, recruitment or appointment processes and other advisory or decision-making activities.

An individual must disclose a relevant interest before participating in the assessment, discussion or decision.

4.5 TROG Board Disclosures

Board Directors must disclose interests in accordance with this policy, the TROG Constitution and applicable requirements of the Corporations Act 2001. TROG may maintain specific disclosure documentation for Directors and the President where required.

The Company Secretary will maintain the register of Director interests and conflicts of interest in accordance with TROG's Board governance requirements. The current register will be available to Directors as part of the Board meeting process.

4.6 Staff disclosures

Employees must disclose relevant interests or potential conflicts to their supervisor as soon as reasonably practicable. The supervisor will determine whether the matter requires management and will consult the CEO or delegate where necessary.

The CEO must disclose their own relevant conflicts to the TROG President.

4.7 Records and COI Register

TROG will maintain an appropriate central record of declared interests and conflicts of interest requiring ongoing management. The record may include:

- the person and their TROG role;
- the nature of the relevant interest;
- the date of disclosure;
- the TROG activity or matter to which it relates, where applicable;
- the management action determined; and
- the date of review or closure, where relevant.

The Board register may be maintained separately where appropriate and need not be duplicated in another register.

Access to COI records will be limited to persons who require the information for governance, management or compliance purposes.

5.0 PROCESS FOR MANAGING CONFLICTS OF INTEREST

5.1 General principles

The appropriate management response will depend on the nature and significance of the interest, the individual's role, the matter being considered and the extent to which the interest could affect, or reasonably be perceived to affect, independent judgement.

Management should be proportionate to the risk presented by the conflict. Disclosure of an interest does not automatically require exclusion from a discussion or decision.

Management options may include:

- recording the interest with no further action required;
- disclosing the interest to the relevant group;
- limiting the individual's access to particular information or papers;
- limiting participation in discussion;
- requiring the individual not to participate in a decision or vote;
- requiring the individual to leave the meeting while the matter is considered;
- recusal from review, assessment or decision-making;
- appointing an independent reviewer or decision-maker;
- reassigning particular responsibilities;
- establishing a formal management plan; or
- in exceptional circumstances, requiring the individual to withdraw from the relevant role or group.

The management action taken must be documented where the conflict relates to a TROG decision or requires ongoing management.

5.2 TROG Board

Directors must disclose and manage conflicts of interest in accordance with the TROG Constitution, the Corporations Act 2001 and this policy.

Where a Director has a material personal interest, any applicable legal restrictions on participating in discussion or voting must be observed. Under section 195 of the Corporations Act, restrictions apply to the presence and voting of directors of public companies with a material personal interest, subject to the statutory exceptions.

Other actual, potential or perceived conflicts that do not require a particular response under legislation or the Constitution will be managed on a case-by-case basis by the President or Board, having regard to the principles in section 5.1.

Where appropriate, a formal management plan may be established for an ongoing conflict. A separate formal management plan is not required for every declared interest where the matter can be appropriately managed and documented through the relevant meeting or decision-making process.

A conflict involving the President will be managed by the Deputy President, FARM Committee Chair or another unconflicted Director nominated by the Board, as appropriate.

5.3 TROG Committees, Working Parties, Special Interest Groups and other decision making TROG groups

The Chair of the relevant TROG group is responsible for determining how a declared interest or conflict relating to a matter before the group will be managed, taking into account the principles and management options in section 5.1.

The Chair may seek advice from the CEO or delegate where the appropriate management approach is unclear.

Where the Chair has the relevant interest, management of the conflict will be determined by the Deputy Chair or another unconflicted member nominated for that purpose.

Particular care should be taken where an individual is reviewing, assessing, ranking or deciding on a matter from which they, their research team or an organisation with which they have a significant relationship may directly benefit. Recusal from the relevant assessment or decision may be appropriate in these circumstances.

Where a member is excluded from a matter because of a conflict of interest, quorum requirements will be managed in accordance with the group's Terms of Reference or other applicable governance requirements.

Where there is disagreement or uncertainty about the appropriate management of a significant conflict, the matter may be referred to the CEO. Where the CEO has an interest in the matter, it will be referred to the President or another appropriate unconflicted Board Director.

The declaration and any management action must be appropriately documented in the meeting minutes or other record of the decision. Where an interest requires ongoing management, it will also be recorded in the relevant TROG COI Register.

5.4 Employees

Where an employee declares an interest, their supervisor will assess whether it represents an actual, potential or perceived conflict and whether management action is required.

Management may include the options in section 5.1 and should be proportionate to the nature and significance of the conflict.

A formal Conflict of Interest Management Plan is only required where the conflict is ongoing, significant or cannot be adequately managed through a simple documented action.

Where a formal management plan is required, it will be agreed by the employee and supervisor and approved by the CEO or delegate.

Any ongoing management plan will be reviewed when circumstances materially change and at an appropriate interval determined when the plan is established.

Conflicts involving the CEO will be disclosed to and managed with the TROG President.

5.5 Institutional conflicts of interest

A conflict of interest may arise for TROG itself where the organisation's financial, commercial, research, partnership or other interests could influence, or reasonably be perceived to influence, a decision or activity for which TROG has an independent governance, scientific or research responsibility.

Examples may include circumstances where TROG has a financial or strategic relationship with an organisation that could benefit from a TROG scientific, research, procurement or other decision.

Institutional conflicts will be disclosed and managed at an appropriate organisational level. Management may include independent review or decision-making, separation of relevant responsibilities, disclosure to affected parties or other controls appropriate to the circumstances.

Institutional conflicts will ordinarily be managed by the CEO. Where the CEO is affected by the conflict, or the matter is of significant governance importance, it will be referred to the President or Board.

6.0 FAILURE TO DISCLOSURE OR APPROPRIATELY MANAGE A CONFLICT OF INTEREST

Where TROG becomes aware that a person may have failed to disclose or appropriately manage a relevant interest or conflict, the circumstances will be considered having regard to:

- the nature and significance of the interest or conflict;
- whether the failure was inadvertent, negligent or deliberate;
- whether the individual had a reasonable opportunity to disclose the interest;
- whether a TROG decision or activity may have been affected; and
- whether remedial action is required.

Depending on the circumstances, action may include:

- requiring the interest to be disclosed and appropriately managed;
- reviewing or reconsidering an affected assessment or decision;
- restricting the person's future involvement in the relevant matter;
- requiring a formal management plan;
- removal from a particular TROG role, committee or activity;
- disciplinary action in accordance with applicable employment arrangements; or
- for Directors, action in accordance with the TROG Constitution and applicable law.

Nothing in this section limits any legal or governance obligations applying to Directors.

If an individual is unsure whether an interest is relevant or may constitute a conflict, they should disclose it. Disclosure does not, of itself, mean that a conflict exists or that the individual must cease participating in the relevant TROG activity.

7.0 REFERENCES & RESOURCES

1. [Australian Code for the Responsible Conduct of Research 2018 | NHMRC](#)
2. [National Statement on Ethical Conduct in Human Research 2025, NHMRC, Australian Research Council and Universities Australia.](#)
3. [TROG Cancer Research Constituion](#)
4. [Australian Institute of Company Directors- Not-for-Profit Governance Principles](#)