



NICA Conflict of Interest Policy

Purpose

The purpose of the Conflict of Interest Policy is to ensure that in dealings with internal and external persons, entities and organisations, employees observe the highest standards of business ethics and avoid any activity or interest that might reflect unfavourably upon their own integrity and good name, or upon the integrity and good name of NICA.

The policy sets out the responsibilities of the employees with respect to conflicts of interest to ensure that any such conflicts are managed in an appropriate manner.

Scope

This policy is applicable to all employees of the National Institute of Circus Arts.

Principles

The Conflict of Interest Policy and Procedure is committed to and guided by the principles of:

- Impartial and objective decision making
- Ethical standards, good judgement, fairness and integrity
- High standards of business ethics

Roles and Responsibilities

- NICA accepts that situations arise from time to time where, for various reasons, some employees may have a conflict of interest. The following responsibilities apply;
- Employees must, when making a decision, adopt a NICA perspective, irrespective of any conflict of interest and must select and deal with suppliers, customers and

other persons doing or seeking to do business with NICA in a completely impartial manner based always on the best interests of NICA.

- An employee must be free from a conflict of interest when dealing with persons or other organisations on behalf of NICA.
- Unless such dealings have been disclosed and specific approval and written authorisation has been obtained, an employee must not:
 - conduct business on behalf of NICA with an associate of the employee
 - divert business of NICA away from another supplier, customer or other person to an associate of the employee
 - be involved in a human resource matter such as recruitment and selection, promotion, disciplinary procedures, staff development, performance review and remuneration in which the employee has a conflict of interest.
- An employee must not seek or accept for themselves or anyone else from any organisation, person or entity which does or seeks to do business with NICA, any gift, entertainment benefit, travel benefit, accommodation benefit or other favours of a character which go beyond common courtesies consistent with ethical and accepted business practices
- It is the responsibility of the employee to declare in advance a conflict of interest and, unless resolved, take no further part in any decision or negotiation on the subject.
- A breach of this policy by staff members may result in disciplinary action being taken by NICA in accordance with relevant NICA policies and procedures

Procedure

Procedure Steps	Responsibility
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<p>General disclosure of conflicts of interest</p> <p>Staff Members</p> <ul style="list-style-type: none"> • Discuss a believed, potential or suspected conflict of interest with the line manager of the employee <ul style="list-style-type: none"> ○ Seek advice from the next level of line management if there is a doubt as to whether a conflict of interest exists 	<p>Employee</p> <p>Line Manager</p>
<p>Resolution or Management Plan</p> <p>Staff Members</p> <ul style="list-style-type: none"> • Devise an appropriate plan to resolve or manage the conflict of interest, ensuring the plan sets out: <ul style="list-style-type: none"> ○ the likelihood of the interests actually coming into conflict ○ the decisions or actions which the employee agrees to avoid ○ the decisions or actions which it is agreed the employee can take or do • Seek the advice of the Operations Manager to assist with the plan if necessary • If the parties cannot agree, determine the plan and notify the Operations Manager • Record the plan on the Disclosure of Conflict of Interest form 	<p>Line Manager</p> <p>Line Manager</p> <p>Line Manager</p> <p>Employee or Line Manager</p>
<p>Lodgement of Disclosure of Conflict of Interest Form</p> <ul style="list-style-type: none"> • Sign the completed Disclosure of Conflict of Interest Form and forward to the Operations Manager 	<p>Employee and Line Manager</p>
<p>Failure to Declare Conflict of Interest</p>	

<ul style="list-style-type: none"> • If it is found that an employee has not declared a conflict of interest, the Line Manager should be informed with a view to a caution being issued to the employee or, if considered necessary, further disciplinary action being taken 	<p>Person identifying conflict of interest</p>
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Examples of a Conflict of Interest

- An employee's near relative has a financial interest in or is a director of a company which supplies good/services to NICA
- An employee is involved in the recruitment of a near relative
- An employee uses NICA assets for their personal gain or the personal gain of a near relative
- An employee sits on the panel assessing a tender application where the employee has a personal relationship with or financial interest in the tenderer
- A staff member is involved in the admission, supervision or assessment of a student with whom the staff member has a personal relationship
- An employee is involved in handling a complaint or a review or appeal decision concerning a student with whom the employee has a personal relationship.

Current Status:

Approving Simona Jobbagy

Authority: CEO, NICA

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