

ACGR Good Practice Guidelines for

Disclosing and Managing Interests in Graduate Research

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AUSTRALIAN COUNCIL OF
GRADUATE RESEARCH

About these Guidelines

Conflicts of interest are a normal part of employment, business relations and when conducting research in large, complex organisations like universities and industries. What is important is that all potential conflicts are identified and appropriately managed, and it is everyone's responsibility to appropriately declare and manage conflicts of interest. In developing this Good Practice Guideline and Managing Interests Matrix, the Australian Council of Graduate Research (ACGR) outlines considerations to managing conflicts of interest that seeks to protect higher degree by research (HDR) candidates, their supervisors and advisory teams, examiners and institutions from the risks associated with actual, perceived and potential conflicts of interest.

Conflicts of interest occur when one individual's personal, professional or other interests compromise their judgement or decision-making in their role. These can be potential, perceived or actual conflicts. All potential, perceived or actual conflicts of interest must be declared and reviewed by an independent third party. The existence of dual or multiple relationships between examiners, candidates, supervisors, industry partners, external advisors and the university have the potential to introduce bias and thus compromise independence in fact or in perception.

These good practice guidelines outline principles for disclosing and managing interests in graduate research training, with a focus on fostering safe and productive relationships amongst candidates and their supervisors, and on ensuring that the assessment outcomes associated with graduate research are unbiased and beyond reproach. Both candidature and examination present possibilities for conflicting interests to affect decision making and student progress. For example HDR candidates work closely and often co-produce research outputs with key academics during candidature; and at the point of thesis submission, appropriate examiners must be selected based on their expertise and international standing. These guidelines are thus intended to provide specialist context in a complex area and to be adaptable enough to work with an institution's conflict/declaration of interest policy and HDR policies and procedures.

ACGR originally published Conflict of Interest in Examination Guidelines in 2011. These have since been revised and used widely across the graduate research sector to guide processes to manage and ensure the independence of HDR examinations in both fact and perception. In

2021, ACGR members requested a broader set of guidelines be developed to offer more comprehensive guidance about managing interests, thus necessitating the guidelines to extend beyond examination to include a range of considerations throughout candidature.

Using the Guidelines

These Guidelines lay out some high-level principles for disclosing and managing declarations of interest and should be read alongside

[*Australian Code for the Responsible Conduct of Research 2018*](#)¹ - *Disclosure of interests and management of conflicts of interest*

[*ARC Strategy*](#)²

[*TEQSA Guidance Note on Academic Integrity*](#)³

The Guidelines are part of a suite of Good Practice Guidelines⁴ that are designed to support institutions as they develop their strategies and processes in particular important areas of operation. They support the Australian Graduate Research Good Practice Principles⁵ which articulate a set of standards considered to be essential for the delivery of graduate research programs.

¹ <https://www.nhmrc.gov.au/about-us/publications/australian-code-responsible-conduct-research-2018>

² <https://www.arc.gov.au/policies-strategies/strategy>

³ <https://www.teqsa.gov.au/latest-news/publications/guidance-note-academic-integrity>

⁴ [Australian Graduate Research Good Practice Guidelines](#)

⁵ [Australian Graduate Research Good Practice Principles](#)

Recommendations

ACGR makes the following recommendations to universities.

Independence of Assessment

1. Emphasise the principle that HDR supervision, assessment and examination/classification of theses is undertaken independently and without bias.
2. It is in the interests of the candidate and a candidate-centred outcome for everyone to take responsibility to declare any interests which potentially affect their role in graduate research.

The Declaration Process

3. Develop a robust declaration process for interests that impact on HDR activities. This should provide clear and accessible information about declaring interests that may affect candidature (e.g. candidature management, scholarship and resource allocation, leave approval, supervision, interim assessment, coursework, placements/internships and examinations) and the management of those interests in a way that complements institutional Conflict of Interest policies. There should be a process for regular review and monitoring of all declarations.
4. Encourage a culture where the professional and ethical responsibility to declare and manage conflicts is readily accepted by all stakeholders
5. Ensure consistency of assessment of declarations of interest which normalise the activity of making declarations, align to the advancement of natural justice and a positive student experience and the integrity of the degree awarded.
6. Nominate a decision maker with appropriate experience and objectivity, to review all declarations with emphasis on decision-making resting with an independent third party (for example the Dean of Graduate Research).
7. Emphasise that a declaration of interest does not amount to a presumption that the individual concerned has or will behave inappropriately.
8. Underscore the principle that managing conflicts of interest (be those perceived, potential or actual) is a holistic process and often involves balancing the risks between what are, taken alone, minor conflicts.

Respectful and Ethical Supervision and Examination

9. Align declarations of interest within candidature with the principles of candidate-centred supervision in the interests of maintaining respectful relationships on both sides.
10. Implement strategies to review and monitor the emergence and management of potential or actual conflicts in supervision (a changed team, changed relationships in the team, new authorship or funding arrangements, appointment of advisory/assessment panels) on a regular basis.

11. Ensure independence of examiners by the use of:
 - a. Internal guidelines on what might constitute (risk of perception of) conflict of interest, and
 - b. A nomination process with a formal review procedure undertaken by a third party (the postgraduate coordinator and/or Dean of Graduate Research)
12. Establish the principle that examiners cannot be expected to make decisions about their suitability to examine, though it is reasonable to expect them to declare possible conflicts of interest and abide by institutional policies.
13. Acknowledge that the presence or perception of possible conflict of interest between the examiner and the candidate, or other parties, should not necessarily and automatically preclude the use of that examiner.

Managing Interest and Consistency of Assessment

16. Establish detailed conflict of interest guidelines or use a matrix (such as the example below) to support principles of transparency and consistency to aid the decision maker in their task and provide a reference point for all involved in HDR candidature and examination, noting that any such guideline or list cannot be considered exhaustive.
17. Provide working definitions of minor or major risk in examples of potential conflict, acknowledging that these examples often exist on a continuum.
18. Distinguish between major and minor potential conflicts of interests and, if a perceived minor conflict is deemed to be manageable, document the decision-making process and the actions to be taken.
19. Ensure that guidelines do not produce unintended consequences. For example, there should be no expectation that a HDR candidate should refrain from attending conferences or presenting a paper in a department where a potential examiner is present.
20. Recognise that some potential conflicts of interest arising through collaborations on research outputs and/or research grants, or membership of an advisory board, may be mitigated by the size of the team and a corresponding relative independence of some members of the team (who may never have met, directly corresponded, or actively co-produced research outputs).

Appendix 1 - Managing Interests Matrix

Please note that this matrix is not intended to be comprehensive and can be adapted to suit the individual institution's needs and context. While the matrix presents the examples in minor and major categories, it is recognized that such conflicts exist on a continuum and are influenced by other dependencies.

A Glossary of Terms is provided below this matrix to assist with interpretation.

Between Candidate-Supervisor

Professional or working relationships	
Minor	Major
Supervisor has a current professional relationship with the candidate (such as shared membership of a Board or Committee, including editorial and grant decision boards) or has general oversight of the candidate in an employment setting (for example, a casual or short-term appointment)	Supervisor is the direct line manager or has significant line management responsibilities (e.g. appointment and performance management) for the candidate, and the conflict cannot be managed through other structures
	Supervisor is currently in, or has had, a business or commercial relationship with the candidate within the last five years (for example, partners in a small business)
	Lack of an appropriate contractual agreement to manage commercial or other interests between supervisor(s) and institution (e.g. stipends) to manage the project arrangements as well as the dispute resolution process
Personal or social relationships	
Minor	Major
Supervisor has, or has had, personal contact with the candidate that may give rise to the perception that the Supervisor may be dealing with the candidate in a less than objective manner	Supervisor has, or has had, a close personal relationship or other social, personal or legal relationship (e.g. landlord or lessee) with the candidate, irrespective of the date of that relationship

Between Candidate-Examiner

Professional or working relationships	
Minor	Major
Examiner has a current professional relationship, such as shared membership of a Board or Committee (including editorial and grant decision boards) with the candidate, but the duties do not require close collaboration and/or contact is limited	Examiner and candidate have professional association, board or committee duties which involves close collaboration and interaction (e.g. both are office bearers)
Examiner is one of multiple authors on a publication or research output with the candidate and/or has been involved in editorial or related	Examiner has co-authored a paper or other research output with the candidate within the last five years, where there was close collaboration

activities, where it is clear that there has been limited contact amongst contributors (for example, the candidate has a chapter or article published in a book or journal edited by examiner)	during the production process
Examiner has attended a candidate's milestone meeting or conference presentation but did not participate in the assessment process; or there was limited intellectual contribution to the direction or outcomes of the work; or the contribution was made as part of a double-blind review process	Examiner has worked with the candidate on matters regarding the thesis development or provided significant input to research design and analysis (e.g. is a current or previous member of the supervision or advisory team or was external reviewer of an assessment piece during candidature)
	Examiner has employed the candidate or vice versa within the last five years
	Examiner is in negotiation to directly employ the candidate or vice versa
	Examiner has acted as a referee for employment of the candidate or vice versa within the last five years
	Examiner is currently in or has had a business relationship with the candidate within the last five years (for example, partner in a small business)
	Examiner has previously assessed the candidate's research, either within the current or any previous higher degree candidatures, within the past five years
	Examiner has a direct commercial interest in the outcomes of the candidate's work
Personal or social relationships	
Minor	Major
Examiner has, or has had, personal contact with the candidate that may give rise to the perception that the examiner may be dealing with the candidate in a less than objective manner	Examiner has, or has had, a close personal relationship or other social, personal or legal relationship with the candidate, irrespective of the date of that relationship

Between Supervisors

Professional or working relationships	
Minor	Major
Some power imbalance exists between the supervisors, but it is not expected to materially affect the relationship and can be managed through other structures	Significant power imbalance exists between supervisors (e.g. line management, senior leadership roles) which may materially affect the supervisory relationship and cannot be managed through other structures

	(e.g. adding diversity to the supervisor team or developing a candidate/supervisor agreement)
Personal or social relationships	
Minor	Major
Supervisors have, or have had, a limited personal relationship, or other social, legal or commercial relationship, which may place the candidate at a disadvantage if they wish to raise concerns about supervision with either member of the team	Supervisors have or have had a close personal relationship or other social, legal or commercial relationship, which may place the candidate at a disadvantage if they wish to raise concerns about supervision with any member of the team

Between Assessor- Supervisor or Assessor-Candidate

Professional or working relationships	
Minor	Major
Some power imbalance exists between the assessor and supervisor(s) assessor and candidate, but it is not expected to materially affect the role of the assessor and can be managed through other structures	Significant power imbalance exists between the assessor and supervisor(s) or assessor and candidate (e.g. line management, senior leadership roles) which may materially affect the role of the assessor and cannot be managed through other structures
Personal or social relationships	
Minor	Major
Assessor and Supervisor have, or have had, a limited personal relationship which may place the candidate at a disadvantage	Assessor has, or has had, a close personal relationship or other social, legal or commercial relationship with the Supervisor(s) or candidate

Between Examiner and members of the Supervision team

Professional or working relationships	
Minor	Major
Examiner has a current professional relationship, such as shared membership of a Board or Committee (including editorial and grant decision boards), with a member of the supervision team	Examiner was a candidate of any member of the supervision team within the past five years or vice versa
Examiner and Supervisor are part of multiple authorship on a publication or research output and/or have been involved in editorial or related activities, where it is clear that there has been limited contact amongst contributors	Examiner has co-authored/edited a publication or output which has required close collaboration with any member of the supervision team within the last five years ⁶

⁶ Mitigating circumstances may exist, for example where the paper in question has a large author list and where the examiner and supervisor have not collaborated directly.

(for example, the Supervisor has a chapter or article published in a book or journal edited by examiner)	
	Examiner holds, or has held, a grant with any member of the supervision team within the last five years ⁷
	Examiner holds a granted patent with any member of the supervision team and the term of the patent is still in force
	Examiner has directly employed the supervisor, or vice versa, in the past five years
	Examiner has co-supervised with any member of the supervision team in the past five years
	Examiner is currently in, or has, had a commercial relationship (for example, partner in a small business or employment) or other contractual relationship (e.g. landlord/lessee) with any member of the supervision team within the last five years
	Examiner is in negotiation to directly employ any member of the supervision team or vice versa
Personal or social relationships	
Minor	Major
Examiner has had limited personal contact with any member of the supervision team that may give rise to the perception that the examiner may be dealing with the candidate in a less than objective manner	Examiner has, or has had, a close personal relationship or other personal, legal or commercial relationship with the supervisor irrespective of the date of that relationship

Between Examiner-University⁸

Professional or working relationships	
Minor	Major
Examiner is currently working for the University pro bono or for a small fee (for example, serving on a review panel or delivering a one-off workshop/training event)	Examiner has an ongoing paid contractual relationship with the University
Examiner has a current professional relationship with the University (for example, holds membership of a Board or Committee)	Examiner is currently in negotiation with the University regarding employment or work contract (other than examining the thesis)

⁷ Mitigating circumstances may exist, for example where the grant in question is held by a large consortium of relatively independent researchers.

⁸ In this context, 'University' will be the institution(s) at which the candidate is enrolled, including partner institutions in cotutelle or other joint delivery higher degrees by research.

	Examiner has received an Honorary Doctorate or other ceremonial award from the University within the past five years
	Examiner graduated from the University within the past five years
	Examiner is a current member of staff or has a current Honorary, visiting scholar, Adjunct or Emeritus position with the University or has had such a position during the candidature or within the last five years
	Examiner has examined for the University two or more times in the past 12 months and/or five or more times in the past five years
	Examiner has had a finding of misconduct or formal grievance with the University, including any case currently under investigation

Between Examiners

Professional or working relationships	
Minor	Major
Examiners have a current professional relationship, such as shared membership of a Board or Committee (including editorial and grant decision boards)	
Examiners hold, or have held, a grant or have co-published with another examiner within the last five years	Examiners hold multiple grants or have frequently co-published in the last five years
Examiners have worked at the same institution in the last five years	Examiner works in the same institution as another examiner
Personal or social relationship⁹	
Minor	Major
	Examiner has, or has had, a close personal relationship or other social, personal or legal relationship with another examiner, irrespective of the date of that relationship

⁹ Noting that a close personal relationship between examiners would need to be disclosed by those individuals, rather than by a member of the Supervision team. Where it occurs, the University would consider the matter accordingly

Between Industry Partner-Candidate¹⁰

Professional or working relationships	
Minor	Major
A power imbalance exists between the industry partner and candidate, but is either not expected to materially affect the relationship, or is appropriately managed through other structures (including contractual arrangements)	Lack of an appropriate contractual agreement between institution, industry partner and/or candidate, to manage the project arrangements as well as the dispute resolution process.
Personal or social relationships	
Minor	Major
Industry partner and candidate have, or have had, a limited personal relationship which may place the candidate at a disadvantage	Industry partner has, or has had, a close personal relationship or other social, legal or commercial relationship with the candidate, irrespective of the date of that relationship

Between Industry Partner-Supervisor

Professional or working relationships	
Minor	Major
	Lack of an appropriate contractual agreement between institution and industry partner to manage the project arrangements as well as the dispute resolution process
Personal or social relationships	
Minor	Major
Industry Partner and Supervisor have, or have had, a personal relationship which may place the candidate at a disadvantage	Industry partner has, or has had, a close personal relationship or other social, legal or commercial relationship with any member of the Supervision team

Glossary of Terms

Assessor: This includes any internal or external members of panels or other milestone events (such as confirmation of candidature) where a significant contribution is being made to the assessment of a candidate's progress or other decisions about candidature.

¹⁰ It is recognised that industry partners, by their nature, exert control over the provision of resources and support for the project/candidature. Such arrangements are ordinarily described in and managed through the contractual arrangement between the institution and industry partner and/or the scholarship agreement between the institution and candidate. The above table focuses on instances where an appropriate contract is absent, or where interactions are evident outside of the contractual terms and which may influence the industry partner and candidate relationship (e.g. candidate is an employee of the industry partner or has a pre-existing personal or social relationship).

Close Personal Relationship: Includes known relative, friend, associate or mentor; an existing or previous emotional relationship including de facto or marriage; legally recognised family member (for example stepfather, sister-in-law etc.); a financially dependent person; a current or former legal guardian or dependent; or one who has power of attorney for another.

Examiner: a person who participates in or is nominated to participate in, examination of a HDR candidate's thesis (including creative works and/or performances and oral examinations).

Industry Partner: an individual in a professional setting outside higher education who agrees to host a candidate for an internship or placement; or who acts in a supervisor capacity for the candidate; or who provides significant resourcing for the candidate and/or project (e.g. scholarship stipend, background intellectual property).

Minor Risk: a conflict that can be appropriately managed through monitoring and a management strategy (e.g. to avoid, reduce or share the conflict); noting that the existence of multiple low-level conflicts would generally change the rating to 'major risk'. Furthermore, minor risk would normally be defined where not more than one individual has a 'minor' conflict of interest.

Major Risk: a significant duality or conflict of interest, generally indicating a need to find an alternative arrangement in order to appropriately manage the risk, such as appointing an alternative examiner, supervisor or assessor.

Publications/research outputs: outputs of variously different forms, that meet the definition of research and have been published or brought into the public domain. This may include books, journal articles, conference publications, original creative works, live performances of creative work, curated exhibitions, patents and research reports for an external body or a portfolio.

Supervisor/Supervision team: A person or persons appointed to oversee the academic direction of the candidature's work throughout the design, execution and dissertation activities. Note that some universities may use the term 'Advisor' to signify academics appointed to support the candidate's research training.