

CONFLICT OF INTEREST POLICY

Approved By	Operations Manager
Approval Date	05/12/2025
Date of Next Review	December 2025

Policy Statement

Competency Training (CT) is committed to ensuring that all decisions, actions and behaviours uphold the integrity, impartiality and professional standards required under the 2025 Standards for RTOs, particularly Standard 4.3 – Risk Identification and Management.

This policy establishes CT’s system for identifying, managing and disclosing any real or apparent conflicts of interest that may influence training, assessment, decision-making or operational functions of the RTO. Its purpose is to protect students, staff, contractors and the organisation by ensuring transparency, fairness and ethical conduct.

Definitions of Conflict of Interest

A conflict of interest occurs when a person’s personal interests conflict with their responsibility to act in the best interests of Competency Training.

Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, personally assessing a friend or family members assessment).

Conflicts may be:

- Actual – the conflict exists presently.
- Potential – the conflict may arise in the future.
- Perceived (apparent) – a third party may reasonably believe a conflict exists.

This policy refers to the interests of Competency Training rather than the “charity” wording used in generic definitions.

Policy

This policy has been developed to address conflicts of interest affecting Competency Training.

Conflicts of interest are common, and they do not need to present a problem to Competency Training as long as they are openly and effectively managed.

It is the policy of CT, as well as the responsibility of the management, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to CT.

Competency Training will manage conflicts of interest by requiring CT employees and any contractor or associate who conducts work for CT to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches.

CT requires all covered persons to act with integrity and in the best interests of the RTO and its students. Individuals must avoid situations where personal interests conflict—or appear to conflict—with their professional responsibilities.

CT maintains a Risk Management Register to record and monitor conflicts of interest. These are managed through a documented system aligned with Standard 4.3 of the 2025 Standards for RTOs.

Conflict of interest disclosures, controls and emerging trends form part of CT's annual self-assurance cycle and are reviewed to ensure continuing compliance with the Standards for RTOs 2025. Outcomes of the review inform continuous improvement actions, audit planning and risk monitoring activities.

CT Management will review the effectiveness of conflict management controls annually, or sooner if triggered by changes in risk level, student impact, or operational decisions.

Scope

This policy applies to:

- CT Employees
- Governing persons and senior leaders
- Contractors and consultants
- Third Party Providers
- Workplace supervisors providing third party evidence
- Moderators, validators and subject matter experts
- Any individual engaged by CT who contributes to decisions, training, assessment, enrolment, marketing or student support

CT Management Responsibilities

CT Management is responsible for:

- ensuring systems for identifying, managing, documenting and reviewing conflicts
- Maintain conflicts of interest in the RTO's Risk Management Register
- Review the register annually
- Provide induction and refresher training on conflict obligations to all staff and providers listed in the scope of this policy

- Promote early disclosure, transparency and ethical conduct.
- Review and approve all conflict-of-interest declarations, risk assessments and control measures through the General Manager or delegated Compliance authority to ensure appropriate governance oversight
- Assess and report notifiable conflict of issues to ASQA when required
- Include conflict considerations in self-assurance, continuous improvement, and audits.
- Analyse conflict-of-interest trends as part of CT's annual self-assurance cycle and use findings to validate compliance and inform continuous improvement planning
- Review the effectiveness of conflict-of-interest controls at least quarterly, or sooner if risk levels, student impact or operational requirements change.
- Ensure conflict-of-interest actions, controls and decisions are applied consistently across the organisation.

Responsible management of this policy will be based on the following five principles:

1. Upholds the requirements of the AS/NZS ISO/IEC 17024
2. Protecting public interest through upholding Competency Training values
3. Supporting transparency and accountability
4. Promoting individual responsibility for integrity and impartiality
5. Developing an organisational culture which encourages effective management of COI.

Staff, Contractor Responsibilities

All covered persons must:

- Complete a Conflict-of-Interest Declaration and Disclosure Form upon engagement, annually and whenever circumstances change.
- Disclose any actual, potential or perceived conflict immediately to their direct manager
- Use the CT Conflict-of-Interest Declaration and Disclosure form to submit to their direct manager
- Refrain from taking part in any decision, task or activity where a conflict exists until CT Management provides a direction.
- Seek guidance from CT Management whenever uncertainty exists about whether a situation may constitute an actual, potential or perceived conflict of interest.

Identification and disclosure of conflicts of interest

Conflicts of interest may arise in various areas of the RTO's operations, including but not limited to:

- Training, assessing or supporting a person with whom there is a personal relationship
- Enrolment, progression or outcome decisions
- Complaints and appeals handling
- Procurement, sub-contracting or commercial partnerships
- Recruitment, performance management or promotion decisions
- Marketing or representation that could benefit a personal or external interest

Once a conflict is identified:

1. The individual must disclose it immediately.
2. The manager must review the disclosure and determine appropriate controls.

3. All conflict-of-interest disclosures must also be reviewed by the General Manager or delegated Compliance authority to ensure consistent assessment and appropriate control selection
4. The conflict is recorded in the Risk Management Register.
5. CT Management implements controls such as role modification, reassignment, or exclusion from tasks.
6. Controls are monitored and reviewed periodically.
7. Monitoring includes scheduled review dates, evaluation of control effectiveness, and adjustments where required to ensure impartiality is maintained and risks are minimised.

Confidentiality of disclosures

Disclosure confidentiality will be managed in accordance with the Privacy Policy.

Managing Conflicts of Interest

2.1. Conflicts of interest of CT Employees and any contractor or associate who conducts work for CT

Once the conflict of interest has been appropriately disclosed, CT Management (General Manager or delegated Compliance authority) will determine whether the conflicted person may continue in specific duties or whether temporary or permanent reassignment is required.

2.2. What should be considered when deciding what action to take

In deciding what approach to take, CT Management will consider:

- Potential impact on students, assessment integrity or fairness
- Whether the conflict poses a risk to student welfare or support outcomes
- Supervision by an independent staff member
- Removal from decision-making panels
- Separation of duties
- Temporary or permanent reassignment of duties
- Targeted monitoring during the conflict period
- Repeated or serious breaches may trigger a review of role suitability

Compliance with this policy

Failure to disclose or appropriately manage a conflict may result in disciplinary action in accordance with CT's HR policies.

Where a conflict-of-interest issue significantly affects or could affect CT's ability to comply with the Standards for RTOs 2025, CT Management will assess the matter as a potential notifiable event and report it to ASQA when required.

All conflict-of-interest decisions, controls and reviews must be documented and retained as evidence to demonstrate compliance with the Standards for RTOs 2025 and CT's internal assurance processes.

Related documents

Conflict of Interest Declaration and Disclosure Form

3. Modification History

Version	Approval Date	Description of Change
V1.0	27/01/2022	First issue
V1.1	22/10/2025	CT Risk Management register reference
V2.0	5/12/2025	Align with 2025 Standards for RTO's and rebrand to CT powered by RelyOn