



# Conflict of Interest Policy

## *Purpose*

Raymont Residential College is committed to the highest standards of ethical conduct, fairness, and transparency in all aspects of its governance, management, and community life.

This policy establishes the principles and expectations for identifying, declaring, and managing actual, potential, or perceived conflicts of interest across all levels of the College. It applies to staff, students, residents, volunteers, and contractors.

**It supports Raymont Residential College's compliance with the National Higher Education Code to Prevent and Respond to Gender-Based Violence (2025), particularly Standards 2 and 7, by addressing conflicts that may arise through power-imbalanced or personal relationships in the residential and educational environment.**

## *Objectives*

- To ensure that all members of the Raymont Residential College community understand their responsibilities in identifying and declaring conflicts of interest.
- To protect the integrity, safety, and reputation of the College and its decision-making processes.
- To ensure that actual, potential, or perceived conflicts are managed transparently and appropriately.
- To provide consistent processes for declaration, recording, and management of conflicts across governance, staff, and residential life.

## *Application*

This policy applies to:

- All employees, contractors, consultants, and volunteers;
- Residential Assistants, live-in staff, and any staff whose substantive role is connected with student accommodation;
- Students and residents representing Raymont Residential College in an official capacity; and
- Any person acting on behalf of Raymont Residential College.

## *Definitions*

A **conflict of interest** arises when a personal interest could, or could be perceived to, improperly influence the performance of duties or decisions made on behalf of Raymont Residential College.

Conflicts of interest may be:

- **Actual** – a direct and current conflict exists;
- **Potential** – a personal interest could conflict with duties in the future; or
- **Perceived** – it could reasonably be seen that a personal interest might influence behaviour or decisions.

Personal interests include:

- Financial or business interests;
- Employment, professional or governance roles in other organisations;
- Family or close personal relationships;
- Romantic, intimate, or sexual relationships between individuals where a power imbalance exists (for example, between staff and students, or Residential Advisors and residents).

## *Policy Statement*

Raymont Residential College expects every member of its community to act honestly, ethically, and in good faith, in the best interests of the College and its residents.

Conflicts of interest are inevitable in a complex residential and educational environment. The key requirement is that such conflicts are identified, declared, and managed transparently.

Raymont Residential College will manage conflicts of interest by requiring all community members to:

- Avoid conflicts where possible;
- Identify and disclose any conflicts as soon as they arise;
- Co-operate fully with management in addressing declared conflicts; and
- Comply with this policy and related procedures.

Where a conflict arises from a personal or intimate relationship in the residential or workplace context, Raymont Residential College will implement appropriate management plans to ensure that the safety and wellbeing of all members of the community are protected. This may include reallocation of supervision, reporting, or residential responsibilities, and will always be handled with confidentiality, respect, and in accordance with trauma-informed practice.

## *Responsibilities*

Under this policy, it is the responsibility of the College and its Managers to:

### **College Leadership Team**

- Foster a culture of integrity and transparency.
- Ensure all staff and residents understand their obligations under this policy.
- Review and record declared conflicts and determine appropriate management actions.
- Ensure consistent communication and confidentiality.

### **All Staff, Volunteers, and Contractors**

- Declare any conflict of interest (actual, potential, or perceived) as soon as it arises.
- Avoid participating in decisions or actions where an undeclared conflict exists.
- Seek advice from their manager or the Principal if unsure whether a conflict exists.

### **Residential Assistants and Live-in Staff**

- Maintain professional boundaries and avoid entering into, or continuing, personal or intimate relationships with residents where a power imbalance exists.
- Declare any such relationship to the Principal or Deputy Principal immediately for confidential management.

### **Students and Residents**

- Avoid engaging in activities that could compromise the integrity of College decisions.
- Declare any personal interests that might affect participation in College leadership, committees, or disciplinary matters.

## *Process for Declaration and Management*

### **1. Disclosure:**

**Declarations are to be made to:**

- *The Principal (for staff, contractors, and residents); or*
- *The Deputy Principal*

### **2. Assessment and Management:**

*The relevant leader will assess the declaration and determine a management plan, which may include:*

- *Documenting the conflict in the Conflict of Interest Register;*
- *Adjusting duties, reporting lines, or accommodation arrangements;*
- *Recusal from decisions or meetings; or*
- *Other measures to mitigate risk and maintain fairness.*

### **3. Recording:**

*The College Administration Staff will maintain a confidential Conflict of Interest Register for Council and staff declarations.*

### **4. Confidentiality:**

*All declarations are confidential and will be treated as personal or sensitive information under the Raymont Residential College Privacy Policy.*

## *Training and Awareness*

*All staff, volunteers, Residential Assistants, and student leaders will complete annual training on:*

- *Ethical decision-making;*
- *Boundaries and professional conduct; and*
- *Preventing and responding to gender-based violence.*

## *Breach of Policy*

*Failure to declare or manage a conflict of interest may result in disciplinary action in accordance with employment, enrolment, or conduct policies.*

*Breaches involving personal or intimate relationships, or potential gender-based violence risks, will be addressed under the Sexual Misconduct Policy and, if required, referred to external authorities.*

## *Review*

*This policy will be reviewed every three years or earlier if required to ensure alignment with:*

*The National Higher Education Code to Prevent and Respond to Gender-Based Violence (2025);*

*ACNC Governance Standard 5; and*

### *Other Relevant Policies*

Where there is a conflict with this policy and with any applicable Australian law, to the extent of any inconsistency, the applicable Australian law will apply instead of this policy.

### *Document Control*

#### **1.1 Availability**

This document is available as part of the *Raymont Residential College Handbook* available on the internal computer network for staff access; and Sharepoint for access.

A copy is also provided to each student at the commencement of each academic year.

#### **1.2 Record of Versions**

The following table of versions records the history of the issuing of this document. It is updated with every amendment of the document.

2. Conflict of Interest Register Template

Individual's Name	Description of Interest	Date of Disclosure	Steps taken to Address Conflict