

Governance, Risk Management and Conflict of Interest Policy

Provider	The Bright College RTO 45752 CRICOS 03945D
Campus	Level 2, 440 William Street, Perth WA 6000
Policy version	3.1
Regulatory review	15 September 2026
Applies to	Internal RTO governance and operations
Policy owner	CEO / Academic Manager
Next review	15 September 2027 or earlier if legislation, registration conditions or operations change

Regulatory framework

- National Vocational Education and Training Regulator Act 2011 (Cth).
- National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025 (effective for RTOs from 1 July 2025).
- National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025.
- Work Health and Safety Act 2020 (WA).
- Work Health and Safety (General) Regulations 2022 (WA) (current consolidation from 1 July 2026).
- Privacy Act 1988 (Cth), including the Australian Privacy Principles and Notifiable Data Breaches scheme.

1. Purpose

To establish governance, risk and conflict-of-interest controls that support quality VET/CRICOS outcomes, student and staff safety, financial viability, regulatory compliance and evidence-based decision-making.

2. Governance

- The CEO and governing persons are accountable for ensuring roles, authorities and compliance responsibilities are defined and monitored.
- Material compliance, quality, financial, student, staffing and third-party matters must be escalated to the appropriate governance forum.
- Decisions must be supported by reliable information, documented actions and follow-up.
- Delegation does not remove the accountability of the person or body with ultimate responsibility.

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3. Risk management

- The College will maintain a risk register covering, at minimum, student safety/wellbeing, training/assessment quality, staff capability, financial viability, prepaid fees/TPS, CRICOS/visa integrity, ELICOS, privacy/cybersecurity, WHS, placements, third parties, facilities, business continuity and reputation.
- Each material risk will have an owner, current rating, controls, actions and review date.
- Risks will be reviewed at planned intervals and when incidents, complaints, audit findings, regulatory changes or operational changes occur.
- Where students under 18 are accepted, child-safety risks must be specifically assessed and controlled.

4. Conflicts of interest

- Staff, governing persons, assessors, validators, education agents and relevant contractors must disclose actual, potential or perceived conflicts that could affect impartiality or decision-making.
- Conflicts must be recorded and managed through controls such as refusal, independent review, changed reporting lines, separation of duties or termination of the arrangement.
- A person must not assess, approve or authorise a matter where an unmanaged conflict could reasonably undermine integrity.

5. Financial and operational assurance

Management will maintain appropriate financial controls, insurance, prepaid-fee/TPS arrangements, continuity planning and regulatory notification processes. Internal audit and management review will test whether controls are operating effectively.

6. Records and review

Risk registers, conflict declarations, management decisions, actions and evidence of review must be retained and form part of the continuous-improvement system.

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