

Conflict of Interest Policy

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The Royal Australian
and New Zealand
College of Radiologists®

RANZCR Conflict of Interest Policy

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Conflict of Interest Policy, Version 2.1

Approved by:
Board of Directors

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The Royal Australian and New Zealand College of Radiologists
Level 9, 51 Druitt Street
Sydney NSW 2000 Australia

New Zealand Office: Floor 6, 142 Lambton Quay, Wellington 6011, New Zealand

Email: ranzcr@ranzcr.edu.au
Website: www.ranzcr.com
Telephone: +61 2 9268 9777

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About the College

The Royal Australian and New Zealand College of Radiologists (RANZCR) is a not-for-profit professional organisation for clinical radiologists and radiation oncologists in Australia, New Zealand, and Singapore. RANZCR is a membership organisation led by clinicians who are elected by the membership, with oversight from a Board of Directors.

We are the leaders in medical imaging and cancer care. We enable the best practice of clinical radiology, radiation oncology and associated subspecialty areas through engagement, education, and advocacy; and by supporting clinical excellence. Our Fellows play a critical role in the diagnosis and monitoring of disease, provide interventional treatments and targeted treatments for cancer.

Our evidence-based culture focuses on best practice outcomes for patients and equity of access to high quality care, underpinned by an attitude of compassion and empathy. As an organisation we are committed to diversity and inclusion, and to the training and professional development of our Fellows and Trainees throughout their career. We are dedicated to enhancing the health outcomes of Maori, Aboriginal and Torres Strait Islander peoples and to increasing their participation in the professions of clinical radiology and radiation oncology by ensuring our educational programs support best outcomes for them. This includes a commitment to cultural safety in our organisation, for staff and members.

Vision

To enable the safe and appropriate use of clinical radiology and radiation oncology to optimise health outcomes for our patients and society.

Values

Our leadership values underpin all that we do and embody our focus on quality patient outcomes:

Integrity

We maintain the confidence and trust of our stakeholders through our honesty, transparency, and authenticity.

Accountability

We take responsibility for all our actions, behaviours, performance, commitments, and decisions.

Inclusivity

We foster an inclusive workplace and clinical environments for people in Australia and New Zealand.

Innovation

We constantly strive to reimagine excellence in everything we do.

Code of Ethics

The Code defines the values and principles that underpin the best practice of clinical radiology and radiation oncology and makes explicit the standards of ethical conduct the College expects of its members.

1. INTRODUCTION

1.1 Approval and Commencement

- (a) Commences operation on 12 August 2022
- (b) Replaces the *Conflict of Interest Policy Version 2.0* which ceases operation on 11 August 2022.

1.2 Purpose

The College is committed to the highest levels of governance and accountability, which require a consistent and transparent approach to the management of conflicts.

Decisions within the College are regularly made that may affect the interests of Members, Staff Members and Stakeholders and also of interests outside of the College. It is very important that the College does this with honesty and objectivity, without any perception that outside influences may have affected the decision-making process, as the College is committed to the highest levels of integrity. Governance is not only about personal responsibility, but about systems and processes that support, amongst other things, a transparent and robust structure.

This Conflict of Interest Policy details a framework for the College, Officers, Committee Members, Staff Members, Members and Stakeholders to identify, avoid and manage actual or perceived conflicts of interest, and to raise awareness of conflict of interest issues.

1.3 Definitions

In this Conflict of Interest Policy:

Accountable Person means a College Officer, Committee Member, Staff Member, Member and Stakeholder

Body includes the board of the College and branches, committees, faculties, working groups and special interest groups of the College

CEO means the Chief Executive Officer of the College

Close personal relationship means a relationship with a relative, a financially dependent person, a close friend or spouse. This does not include a working relationship which exists due to ordinary collegiate collaboration, where the individuals are not relatives, financially dependant or spouses

College means The Royal Australian and New Zealand College of Radiologists

College Supervisor means for College Officers the President or CEO, for Committee Members the Chair, and for Staff Members, Members and Stakeholders the CEO or General Manager

Committee Meeting means all Board/Faculty/Council/Working Group meetings or any other minutes gathering of members undertaken as College business

Committee Member means a member participating in a committee meeting of the College

Conflict of interest arises when a person makes a decision or exercises a power in a way that may be, or may be perceived to be, influenced by either material personal interests (financial or non-financial) or material personal associations

Corporations Act means the Corporations Act 2001 (Cth)

Financial interest refers to the possibility of a financial or other material gain arising in connection with decision-making. It can mean any employment, business activity or other right, claim, title or legal share in something that has a monetary or equivalent value. Examples of financial interest include, but not limited to, shares, share options, dividends, awarding of a contract to a company which the member is involved, and the right to receive remuneration or other benefits such as salaries, director's fees, consulting fees, allowances and discounts

General Manager means the general manager or senior supervisor of the activity of the issues relates, and in the absence of clarity, the CEO

Governance Standards means the governance standards to be met by the College to remain registered with the Australian Charities and Not-for-profits Commission

International Medical Graduate (IMG) means International Medical Graduate who have completed their primary and specialist medical training overseas. IMGs are assessed by the College for comparability to an Australian/New Zealand trained clinical radiologist or radiation oncologist

Meeting means a meeting of relevant body of the College

Meeting Chair means the chair of the relevant meeting

Member means a member of the College, Fellows and Trainees are members

Non-financial interest refers to the benefits not linked directly to material gain. It means any community or other voluntary activity or involvement including with a sporting club, church, political party or other formal or informal association or group. It can also mean the enhancement of career or possibility of acquiring additional professional recognition, status or fame

Officer means a director, secretary, or other office bearer of the College

Spouse includes, in relation to any person, another person who is in a de facto relationship with that person as defined by Section 3(1) of the Property (Relationships) Act 1984 (NSW)

Staff Member means any person working in a permanent, temporary, casual, termed appointment or honorary capacity within the College and for the avoidance of doubt includes contractors, consultants, and other workers at the College, including all personnel associated with third parties

Stakeholders mean individuals or entities interacting with the College. This includes contractors and external organisations

Trainee means a College member actively participating in either the Clinical Radiology Training Program or the Radiation Oncology Training Program and is considered a student member under the RANZCR Articles of Association.

1.4 Types of Conflict of Interest

The term 'conflict of interest' refers to situations in which financial, non-financial or other personal considerations, affiliations or relationships may compromise, or have the appearance of compromising, an individual's ability to exercise objectivity or make an impartial judgement or decision in their professional capacity. The conflict may be actual, perceived or potential.

- An actual conflict of interest is one where there is a real conflict of between professional responsibilities and private interests.
- A potential conflict of interest arises where private interests could under certain circumstances be at odds with the individual's professional duties.

- A perceived conflict of interest may exist where a third party might form a view that the individual's private interests could improperly influence the performance of their professional duties.

1.5 Conflict of Interest

A conflict of interest is a situation which occurs if an interest or activity:

- Influences, or appears to influence, the ability of the individual to exercise objectivity, or
- Impairs, or appears to impair, the individual's ability to carry out responsibilities in the best interests of the College.

An individual is considered to have a potential conflict of interest when:

- he/she or a family member or close associate may receive a financial or other significant benefit as a result of the individual's position at the College;
- he/she has the opportunity to influence the College's business, administrative or other material decisions in a manner that leads to personal gain or advantage; or
- he/she, a family or a close associate has an existing or potential financial or other significant interest that impairs, or might appear to impair, his/her independence in the discharge of his/her responsibilities to the College.

Conflicts must be considered having regard to individual circumstances, as well as those of a relative, family member, close associate or related business entity who has the potential to derive a benefit, or detriment, from a particular decision.

In the majority of cases, conflicts of interest can be effectively managed by being aware of the potential for conflict and the exercise of good judgement.

If a actual, perceived or potential conflict of interest is not managed in an appropriate or transparent fashion, it has the potential to:

- Damage effective decision-making;
- Undermine the integrity of the College and its Stakeholders;
- Undermine the functioning of the College and its Stakeholders;
- Attract adverse publicity;
- Call into question the validity of the decisions made by the College; or
- Expose individuals to allegations of improper conduct and fines or penalties for non-compliance with statutory duties under the Corporations Act and/or the Governance Standards

The fact that an individual member of a College committee or the Board has failed to comply with this policy does not, of itself, invalidate the decisions of that committee.

A conflict will usually be addressed by full disclosure, recusal and not participating in a decision and/or not being present at the time the decision is made, depending on the circumstances and the nature of the decision.

2. RESPONSIBILITIES

All Accountable Persons are required to:

- (a) Be aware of, understand and comply with this Conflict of Interest Policy;
- (b) Assess their own private and personal interests and whether they conflict or have the potential to conflict with the College's interests;
- (c) Make appropriate disclosures for inclusion in conflict of interest registers relevant to the activity; and
- (d) Manage any actual or potential conflicts of interest in accordance with this Conflict of Interest Policy.

If any Accountable Person is unsure as to what constitutes a conflict of interest, they should discuss this with a College General Manager, and in the absence of extenuating circumstances, assume that a conflict exists so as to avoid any suggestion of improper conduct.

2.1 Officers Conflict of Interest

The provisions of this policy recognises that Officers act as Directors of the College as a company and that the Corporations Act specifically provides for all decisions of Council (as the Board of Directors) that:

- (a) Directors must give notice of all "material personal interests" in matters relating to the affairs of the College (which may be narrower than a general conflict of interest). The College will maintain a register of interests declared by Directors;
- (b) It is not a material personal interest if all Directors have the same interest (e.g. Fellow of the College);
- (c) Notice must be given to the nature and extent of the interest and its relation to the affairs of the College. Notice must be given as soon as the interest arises, or the Director becomes aware. A standing notice of all such interests may be given;
- (d) In respect of a matter in which the Director has an interest, the Director cannot be present while the matter is **being considered** and cannot vote on the matter.
- (e) A director may be present and may vote if the other Directors permit, on the basis that the interest is fully disclosed, and the other Directors are satisfied that the interest should disqualify him or her.

(SS. 191-195 Corporations Act-Cth)

3. AVOIDING CONFLICTS OF INTEREST

All Accountable Persons must take reasonable steps to avoid conflicts of interest with the interests of the College where practicable.

For example, Accountable Persons must avoid:

- (a) Using College assets or confidential information for personal gain;

- (b) Accepting gifts to the value, grants or favours from persons who would benefit from influencing the College such as trainees, job applicants or suppliers or if it may reasonably be considered as connected to their position as a decision maker (or potential future decision maker);
- (c) Being involved in the admission, supervision, assessment or examination of a trainee or IMG with whom he or she has, or has had, a familial or other close personal relationship;
- (d) Assessing or examining candidates with whom they have a financial or other economic relationship which may be perceived as affecting the independence of their decisions in respect of that candidate;
- (e) Examining an IMG examination candidate in a College examination whereby the assessor/examiner has previously assessed that examination candidate through the IMG assessment pathway;
- (f) Being directly affiliated with the financially remunerated by another organisation (e.g. an organisation which delivers educational material such as non-College endorsed examination preparation courses) whilst also undertaking a role for the College which is directly relevant to their affiliation with the other organisation (e.g. an Accountable Person examining candidates in College examinations at the same time in which they are directly affiliated with and financially remunerated by another organisation which, for example, delivers educational material such as non-College endorsed examination preparation courses);
- (g) Taking part in any recruitment, supervision, promotion or grievance process with a prospective or current Staff Member, College member or representative or contractor with whom he or she has, or has had, a close personal relationship;
- (h) Taking part in assessing a tender or grant application where he or she has, or has had, a close personal relationship with the tender applicant;
- (i) Undertaking in research/clinical trials which are sponsored by a company which the researcher (or an associate of the researcher) has a financial interest or holds an executive position;
- (j) Chairing a committee responsible for allocating funding for research at a facility/tertiary education institution which is the Chair's own institution or school/department/faculty; and
- (k) Receiving benefits from another organisation that the College is considering or are contracting with for goods and services, such as grants funding, conference entitlements gifts or hospitality.

4. DISCLOSURE

4.1 Standing Notice of Conflicts

All Accountable Persons should be aware of the Governance Standards and follow this Conflict of Interest Policy to identify whether Conflicts of Interest are actual, potential or perceived.

Accountable Persons have a duty to declare any Conflict of Interests that may influence their objectivity or affect their ability to fulfil their responsibilities.

All Accountable Persons must complete a Conflict of Interest Form annually in order to make transparent any conflicts of interest that may arise and to aid the effective management of potential or perceived conflicts of interest.

4.2 Updating Annual Statement

As soon as an Accountable Person becomes aware of a new conflict of interest or a potential conflict of interest, they must immediately complete an additional written statement of interests and declare it to the relevant College supervisor, being:

- College Officers – the President or the Chief Executive Officer;
- Committee Members – the Chair of the relevant committee;
- Staff Member – the Chief Executive Officer or General Manager;
- Member – the Chief Executive Officer or General Manager; and
- Stakeholder – the Chief Executive Officer or General Manager.

4.3 Disclosure at Meetings

In addition to providing a written statement of their interests, Accountable Persons should declare any identified conflict prior to the consideration of relevant matters, as outlines in Part 6 of this Conflict of Interest Policy.

4.4 Failure to Disclose an Interest

Failing to disclose, potential or perceived conflict of interest may be regarded as a breach of this Conflict of Interest Policy and may constitute a breach of duties, including duties under the Corporations Act, the Governance Standards and under common law.

If it becomes apparent that an interest was not disclosed or that a decision may have been made when a conflict of interest existed, the matter must be reviewed in accordance with Part 8 of this Conflict of Interest Policy.

Unless otherwise agreed in writing, any Staff Member, Member or Stakeholder who is considering engaging in any business or activity that conflicts with the College's interests must have prior written consent of the College.

5. MANAGEMENT OF CONFLICT OF INTEREST MANAGEMENT PLAN

If a conflict of interest is identified in respect of an individual or entity (being an Accountable Person), an appropriate plan should be developed to resolve or manage the conflict of interest.

A conflict of interest management plan must include:

- (a) The nature of the conflicting interest;
- (b) The interest of the College with which the interests conflicts or could conflict;
- (c) The likelihood of the interests actually coming into conflict;
- (d) The decisions or actions which the individual or entity agrees to avoid or not take part in;
- (e) The decisions or actions which are agreed to be permissible; and

- (f) The timeframe for the plan time reviewed.

Once a management plan is devised it must be signed by all parties and placed on the College's file for the individual or entity and reviewed regularly or on an as-needs basis, as agreed. This management plan will be treated as a confidential document in accordance with the College's Confidential Information Policy. However, a register of interest is disclosable.

6. MANAGEMENT OF CONFLICTS DURING MEETINGS

6.1 Disclosure in Meetings

Accountable Persons must disclose conflicts of interests prior to the commencement of any relevant discussion of the matter, unless the conflict of interest:

- (a) Has already been declared during a standing item for the disclosure of conflict of interest at the beginning of the meeting (or in the morning of the meeting in cases where the meeting is longer than a day);
- (b) Has already been documented in a Conflict of Interest Form (and remains identical to that documented); and /or
- (c) Has already been identified and raised in the meeting by the meeting's Chair.

For the purpose of identifying reportable conflicts, the Chair of the meeting must, prior to the deliberations of the relevant body, request relevant interests be declared.

Irrespective of procedure followed by the Chair of the meeting or any conflict of interest form or any prior disclosure (written or otherwise), the relevant individual is responsible for ensuring their conflict of interest is declared, minuted and managed prior to the commencement of any relevant discussion.

6.2 Determination of Whether a Conflict Exists

The Chair of the meeting will decide whether a conflict of interest exists. If the Chair is uncertain, a conflict of interest will be deemed to exist. If the Chair makes a disclosure, the Deputy Chair will make the decision or in the absence of a deputy, the decision is made by those members of the Board, committee or other body who have not disclosed a conflict of interest.

6.3 Deliberations and Voting

When a conflict of interest is identified, individuals should manage the conflict in the following ways:

- **Declare a conflict** – once identified, a conflict of interest should be declared at the earliest opportunity and recorded in the minutes of the meeting
- **Leave the meeting** – the person who declares a conflict should leave the meeting and the other committee members should decide whether their absence is appropriate or necessary.
- **Decide on next steps** – this depends on the conflict, if the committee decided that there is no conflict, the individual can return to the meeting. However, if the conflict is of such low level that it can be managed then the organisation should determine how best to protect its interests. The individual may, for example, absent themselves from parts of the meeting where the conflicting activity/item is discussed. On the other hand, if the conflicts are so frequent or serious that the individual's usefulness is considerably lessened, they should resign from their post as committee member or cease the conflicting activity.

- **Record the process** – the process above should be clearly minuted and a register of interests be held where individuals can record their interests.

If in doubt, it is best that the individual not participate. Even the perception on conflict should be avoided. Failing to follow these steps could mean that the decision could be invalidated or impugned.

Note that for College Board meetings, in the event of conflicts, the director must be present when the issue is being considered.

6.4 Assessment of Quorum

Unless the Chair of a meeting determines otherwise, a conflicted individual may be counted for the purposes of determining whether a quorum exists for a vote on the matter in respect of which a conflict exists.

If the exclusion of one or more conflicted individuals results in a lack of a quorum, the Chair of the meeting must:

- If the matter required resolution before the relevant body can reconvene with a quorum, refer the matter to the committee/body who is responsible for the relevant body;
- If there is no reasonable prospect of the body achieving a quorum, refer the matter to the committee/body who is responsible for the relevant body; or
- If the matter can be deferred and considered by a quorum within a reasonable time, defer the matter for consideration at a subsequent meeting.

6.5 Teleconferences and Circular Resolutions (Out of Session Decisions)

The identified procedures apply irrespective of whether a meeting is convened in person or by a technological means.

Where a matter is considered by circulatory resolution, a conflicted individual is entitled to receive notice of the matter, but based on the nature of the conflict, supporting information may be withheld from that person.

Where a matter is considered by teleconference or similar means, a conflicted individual is entitled to receive notice of the matter but may be asked to leave the teleconference for the affected part of the meeting, and subsequently re-join. The Chair may, where aware of a Conflict of Interest, omit part of an agenda or meeting paper from those provided to a conflicted individual.

6.6 Obligations of the Chair

6.6.1 The Chair of a meeting is responsible for ensuring:

- a) a standing agenda item calling for all declarations of interests upon commencement exists, administered in all meetings;
- b) persuing standing conflict notices prior to each meeting to identify possible conflicts of interests in the proposed content. If the Chair is uncertain, a Conflict of Interest will be deemed to exist and adjust the agenda and meeting papers in accordance with clause 6.5

6.6.2 If the Chair is conflicted in any matter, they must withdraw from that discussion. The Deputy Chair (if not conflicted) may chair that item or if there is no Deputy Chair, he non-conflicted members present in the meeting may choose a member who is similarly non-conflicted to chair that item.

6.7 Minutes of a Meeting

6.7.1 The minutes of a meeting should record:

- a) The fact a declaration as made and the details of the conflict;
- b) The process adopted by the body to deal with it and the Management Plan associated;
and
- c) The resolution or conclusion of the body following its consideration of the matter,
including any actions that were taken.

6.7.2 A conflicted individual may not access minutes concerning the matter in respect of which a conflict of interest arose.

7. CONFLICTS OF INTEREST IN RESEARCH

It is critical that conflicts of interest in research are appropriately managed as they can compromise the validity and integrity of the research process and undermine public confidence in the College.

Researchers have additional responsibilities under the Australian Code for the Responsible Conduct of Research, which recommends:

- a) When invited to join a research committee or equivalent, each individual should review current research activities for actual or apparent conflicts and bring possible conflicts of interest to the attention of those running the activities; and
- b) Committees should maintain records of research activities which may lead to conflicts, for example, maintain membership lists for committees, noting where they hold financial delegation or are in receipt of cash, services, or equipment from third parties.

Researchers should also be aware of and comply with any additional requirements for disclosure of conflicts of interest from funding bodies.

Researchers, particularly biomedical and clinical researchers, should not receive any direct benefit from clinical trials and must disclose any indirect benefit from the outcome of clinical trials.

Commercialisation of research is increasingly important, and it is recognised that substantial benefits can arise from collaborations and relationships with industry in the licensing and marketing of research discoveries and in the creation of spin-off companies. These activities may also be a source of conflict of interest, which may need to be appropriately managed.

8. CONFLICTS IN EXAMINATIONS

If a staff member or College member who has a potential conflict of interest in a matter before a College entity of which he or she is a member, that staff member or College member must disclose the interest to the relevant entity. If there is doubt as to the materiality of the interest, the Chair will decide as to whether conflict does or does not exist.

Acceptance of Gifts or Benefits

In general, staff members and College members should not solicit or accept any gifts or benefits that might in any way appear to compromise or influence them in their official capacity. If the individual is in any doubt, guidance should be sought. The offer of gifts or benefits arising as a result of an individual's involvement with the College must be reported immediately to the CEO or General Manager.

Paid Participation in Fee-Paying Examination Revision or Preparation Courses

It is recognised that some individuals involved in the development and conduct of College examinations are involved also in the development and conduct of revision/preparation courses for candidates attempting College examinations. The College makes a clear distinction between such courses that are held in College accredited training hospitals (or other sites) and are endorsed by the College for the benefit of trainees, and those that are not endorsed by the College and are run by members as private individuals, either on or for a profit basis.

Pro-bono participation in hospital revisions/preparation courses of members who are involved in the development and conduct of College examinations is set out separately below. The College is, however, very clear regarding the involvement in College examinations of members who have material involvement in the organisation or delivery of revision/preparation courses that are not endorsed by the College and where a fee for participation is involved, regardless of whether the course is being conducted for profit or not for profit basis.

In summary, it is the position of the College that when an individual participates in any role in the examination process, no access to examination items will be permitted prior to or after the conduct of a College examination to members involved in examination revision/preparation courses where a fee is charged for participation. This includes participation in examination question development or standard setting for any examination, or as an examiner, regardless of whether that involvement may be considered minor (eg, knowledge of an examination). Further to this, any possible conflicts that members feel may arise from their involvement in College examination processes and significant paid participation on examination revision or preparation courses should be declared to the College and updated on an on going basis on a register of interests held by the College.

Pro Bono Participation in examination Revision or Preparation Courses

The College recognises the significant pro-bono contributions of members in training trainees, including in assisting trainees in preparing for College assessment tasks, such as examinations. The difficulty for some members in balancing their role in such activities with other College roles in assessment activities is understood and the College has no desire to inhibit the participation of members in either activity. However, it must be recognised that conflicts (perceived or otherwise can occur and may not be immediately obvious or understood. Further, the range of College activities in which members may be involved renders any complete listing of possible conflicts extremely difficult. Thus, any potential conflicts that members feel may arise from their involvement in College examinations should be declared and updated on an ongoing basis on a risk register held by the College.

Conflicts can be considered, and individuals advised accordingly.

9. BREACH OF THIS POLICY

If a decision was made by an individual with a material but undeclared conflict of interest, or if a conflict of interest was insufficiently assessed or managed, the matter will be promptly investigated by the Board or its nominee to determine the facts and the action to be taken by the College. In such cases the College Board or its nominee may require that a College officer, examiner assessor, committee member, Staff member or other College member stand down from their role pending the outcome of the investigation.

Staff Members should be aware that non-compliance with this Policy will be considered serious misconduct and disciplinary action (which may include immediate dismissal) will be taken against any Staff Member who fails to comply with this Policy. Staff members must report any perceived conflicts of Interest to the CEO or General Manager.

Members who breach this Policy risk having their membership with the College terminated or suspended. The College may also seek to recoup any costs incurred as a result and reserved other remedies available at law.

In addition, where the common law, the Governance Standards and/or the Corporations Act impose duties on Officers, a failure to comply with the relevant laws may result in considerable civil penalties, restitution orders or even criminal sanctions.

10. COST RECOVERY

If a Staff Member breaches this Conflict of Interest Policy, the College may seek reimbursement of any expense incurred by it as a result of that breach of the Policy. For Example, if a Staff Member passes on information to a competitor which results in loss of revenue, the College may seek reimbursement of that loss of revenue.

The College may set off the amount recoverable under this Policy from any amount otherwise payable by the College to a Staff Member.

The College reserves all the other rights and remedies available to it at law.

11. RELATED POLICIES AND DOCUMENTS

- Privacy Policy
- Confidential Information Policy
- Code of Ethics