

# Compliance Policy

## Section 1 - Purpose / Objectives

(1) The purpose of the Compliance Policy is to:

- a. Demonstrate Victoria University's commitment to compliance;
- b. Support and facilitate good governance, through a proactive approach to compliance management;
- c. Develop and promote a culture that values compliance across the University; and
- d. Enable continuous improvement in compliance, in order to effectively meet the needs of the University.

## Section 2 - Scope / Application

(2) This policy applies across the University.

## Section 3 - Definitions

(3) Compliance- means adhering to the requirements of law (acts, regulations and other legislative instruments), standards, codes and policies, as well as principles of good governance and accepted community and ethical standards.

(4) Compliance culture - means the values, ethics and beliefs that exist throughout the University, and interact with the University structures and control systems to produce behavioural norms that are conducive to compliance outcomes.

(5) Compliance Management Framework - refers to a series of instruments, activities and processes undertaken by the University, that when combined are intended to achieve compliance, and enable an effective, co-ordinated approach to the management of compliance obligations, issues and risks.

(6) Compliance Obligations Register - means the list of compliance requirements that have been identified by the University.

## Section 4 - Policy Statement

### Policy Commitment

(7) Victoria University is committed to compliance with all relevant laws (acts and regulations), standards, codes, and policies.

(8) As a public body involved in teaching, training, research, community and business engagement, the University is required to comply with numerous obligations relating to its key activities and stakeholders, and effectively integrate these into day to day operations. Compliance is fundamental to the University achieving its strategic, operational and business objectives, and good governance.

(9) In order to meet its obligations and objectives, and develop a proactive culture of valuing compliance, the University is committed to its Compliance Management Framework developed in accordance with the Australian Standard AS/ISO 19600:2015.

(10) This policy is also consistent with the Staff Code of Conduct, which upholds the University's commitment to the highest standards of excellence, integrity and ethical behaviour.

### **Policy Principles**

(11) This policy is based on the key principles as outlined within the Australian Standard AS/ISO 19600:2015.

### **Commitment**

(12) Victoria University's commitment to effective compliance is demonstrated by:

- a. Endorsement and active support by Council, Compliance Audit and Risk Committee and the Senior Leadership Team of the objectives of the Compliance Management Framework;
- b. This Compliance Policy, which is aligned to the University's strategic and operational objectives and is endorsed by Council;
- c. Allocation of appropriate resources across the University, to develop, implement and maintain the Compliance Management Framework;
- d. Identification and assessment of compliance obligations using a risk management methodology; and
- e. Development and maintenance of a university-wide [Compliance Obligations Register](#).

### **Implementation**

(13) The University adopts a risk-based approach to implement its Compliance Management Framework, and in doing so will ensure that:

- a. Responsibility for compliance obligations is clearly articulated and assigned for all levels of staff, as it relates to their specific role and activities undertaken on behalf of the University;
- b. Education and training needs are identified and addressed, in order to enable staff to fulfil their compliance obligations;
- c. Behaviours that create and support compliance are encouraged and behaviours that compromise compliance are not tolerated; and
- d. Controls are in place to manage identified compliance obligations and achieve desired behaviours.

### **Monitoring and Measuring**

(14) The University will monitor, measure and report upon the performance of its Compliance Management Framework, and demonstrate it through documentation and practice.

### **Continual Improvement**

(15) The University's Compliance Management Framework will be reviewed on an ongoing basis in order to:

- a. Ensure its continued adequacy and evaluate its effectiveness;
- b. Identify and realise opportunities for continuous improvement.

## Section 5 - Procedures

(16) [Annual Declaration on Compliance / Notification of Material Change / FIT and Proper Person Procedure](#)

## Section 6 - Guidelines

(17) Nil

## Status and Details

|                            |  |
|----------------------------|--|
| <b>Status</b>              | Historic   |
| <b>Effective Date</b>      | 4th September 2014   |
| <b>Review Date</b>         | 30th June 2019   |
| <b>Approval Authority</b>  | Vice-Chancellor  |
| <b>Approval Date</b>       | 4th September 2014   |
| <b>Expiry Date</b>         | 31st July 2018   |
| <b>Accountable Officer</b> | Diana Ortisi<br>Chief Financial Officer<br>+61 3 9919 5210   |
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