# Compliance Policy

# Section 1 - Summary

(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 - Accountability

| Accountable/Responsible Officer | Role |
|---|---|
| Accountable Officer | Chief of Staff |
| Responsible Officer | Director, Risk and Compliance |

**Key Decision-making powers under the Policy (if applicable)**

| (Delegated) Power | Role |
|---|---|
| Power to waive consultation on Policy if regulation, legislation, Codes or strategic objectives require. | Director, Risk and Compliance |

# Section 3 - Scope

(2) This Policy applies across the University.

# Section 4 - Definitions

(3) Compliance

(4) Compliance Culture

(5) Compliance Management Framework – 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.

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(6) Compliance Obligations Register

# Section 5 - 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 and reflects Australian Standard ISO19600:2105.

(10) This Policy is also consistent with the Appropriate Workplace Behaviour Policy, 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 within the Australian Standard ISO19600:2015.

## 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.

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### 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.

### Determination of Policy and Procedures

(16) Policies and Procedures are:

a. binding on all University staff and students;
b. classified under one of the following categories:
    i. Academic:  relating to the delivery of learning and teaching;
    ii. Governance:  relating to the governing of the University; or
    iii. Operational: relating to how the University carries out its day to day management of staff, students, facilities and other matters.
c. consistent with, and do not duplicate, the University Act, Statute, Regulations or Policy and Procedure.

(17) Policy and Procedures are reviewed by the Accountable Officer every three years from the date of approval (if not earlier).

(18) Regulations are reviewed by the Accountable Officer and Legal Services every five years from the date of approval (if not earlier).

(19) No Policy, Procedure or Regulation will be approved or published without an accompanying Implementation Plan.

# Section 6 - Procedures

(20) Compliance - Policy Development Procedure

(21) Compliance - Regulatory Reporting Procedure

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## Status and Details

| | |
|---|---|
| **Status** | Historic |
| **Effective Date** | 26th September 2019 |
| **Review Date** | 26th September 2022 |
| **Approval Authority** | Vice-Chancellor |
| **Approval Date** | 24th September 2019 |
| **Expiry Date** | 29th November 2023 |
| **Accountable Officer** | Trish Roberts<br>Chief Financial Officer<br>trish.roberts@vu.edu.au |
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## Glossary Terms and Definitions

**"Compliance"** - 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.

**"Compliance Culture"** - 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.

**"Compliance Obligations Register"** - The list of compliance requirements that have been identified by the University.

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