WESTERN SYDNEY UNIVERSITY

COMPLIANCE STRATEGIC PLAN

2019-2022

This Strategic Plan represents an overview of strategies to begin implementation during fiscal year 2019, led by Western University's Compliance Program Unit.

The Compliance Strategic Plan Is aligned with the 2018-2020 Securing Success Strategic Plan of the University.

WESTERN SYDNEY
UNIVERSITY
W

A message from the Vice-Chancellor...

"One of the goals outlined in our Securing Success Strategy is to aspire to the highest standards of University governance and accountability.

The University's role in Western Sydney and in the lives of our students is a privilege that brings expectations and responsibility.

Individually, and collectively, we have legal obligations to our students, to our colleagues, and to the community. Above and beyond this, we want to maintain a culture of integrity.

As well as covering laws and policies, our Compliance Program applies values, and ethical community standard.

Compliance Is not just about ticking the box.

But it is embedded in our culture through the values, attitudes and behaviours of our staff."

To see the video message, visit the Compliance Program Unit intranet page.

WESTERN SYDNEY
UNIVERSITY

ABOUT THE COMPLIANCE PROGRAM UNIT

OUR PEOPLE

Keira Hamilton heads the Compliance Program Unit as the Compliance Program Manager, based at Parramatta South campus. She provides guidance and practical resources to all University staff relating to the application of legislative requirements within the compliance management program.

Prior to joining the University, Keira worked in Australia and North America for international companies such as Thomson Reuters and Toronto-Dominion Bank. She has experience in risk, governance, training, policy writing, and legal publishing. She also has worked at another Australian university in its records and archives department.

Keira holds a Double Degree in Media and Law (BMedia / LLB). She is also a certified Compliance and Risk Professional (CCRP), and an appointed NSW Justice of the Peace (NSW JP).

OUR DIVISION

The Compliance Program Unit is part of the Office of the University Secretary and General Counsel, and is located within the Division of the Senior Deputy Vice-Chancellor.

OUR DAY-TO-DAY

The Compliance Program Unit provides guidance, advice, and relevant information to all University staff relating to the University's Compliance Program. It also assists on special projects, including guidance on policies and training, owned by other business or academic units, from a compliance perspective.

OUR AIMS

- Support staff in understanding and meeting their compliance goals and obligations
- Develop a culture of understanding compliance within daily business
- Apply a "common sense" approach to developing and maintaining the University's Compliance Management Program

OUR GUIDING PRINCIPLE

"Do the right thing in the right spirit"

OUR CONTACT DETAILS

- compliance@westernsydney.edu.au
- 02 9685 9897
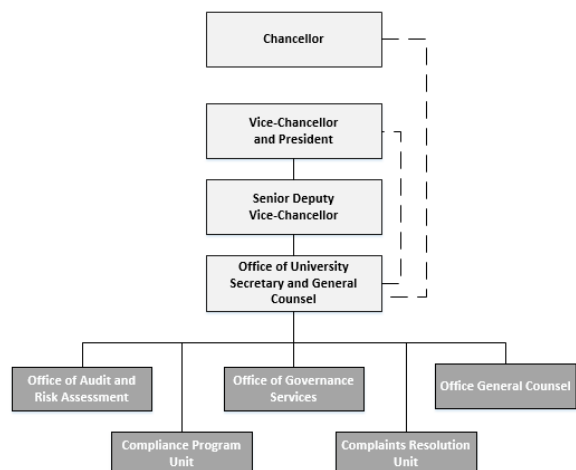
ASPIRATIONAL

OUR VALUES

Ethics & Integrity
Commitment & Enhancement
Relevance & Responsibility

OUR VISION

To secure, demonstrate, and continue a culture of integrity and socially responsible behaviour.

ACHIEVABLE

OUR MISSION

Enable the management of compliance obligations to protect from legal, reputational & financial risks.

OUR STRATEGY

Connect
Calibrate
Collaborate
Communicate

ACTIONABLE

OUR OBJECTIVES

Implement a Compliance Management Program.

Integrate and improve policies and procedures.

Increase training and awareness.

OUR ACTIONS

See Annual Compliance Plans

WESTERN SYDNEY
UNIVERSITY

ABOUT COMPLIANCE STRATEGY

WHAT MOTIVATES COMPLIANCE?

OUR VALUES
- Ethics & Integrity
- Commitment & Enhancement
- Relevance & Responsibility

OUR VISION
To secure, demonstrate, and continue a culture of integrity and socially responsible behaviour.

WHAT DRIVES COMPLIANCE?

OUR MISSION
Enable the management of compliance obligations to protect from legal, reputational, and financial risks.

OUR STRATEGY
- Connect
- Calibrate
- Collaborate
- Communicate

WHAT ACHIEVES COMPLIANCE?

OUR OBJECTIVES / STRATEGIC PRIORITIES
- Implement a Compliance Management Program
- Integrate & improve policies & procedures
- Increase training & awareness

OUR ACTIONS
- See Operational Compliance Plans (annual)

ALIGNED TO SECURING SUCCESS STRATEGY 2018-2020
- Goal 6: A dynamic and Innovative Culture that Secures Success
  - 6.1: Ensure the highest standards of university governance and accountability and promote inclusive and participatory decision-making.

WESTERNSYDNEY.EDU.AU

OUR STRATEGIC PRIORITIES / OBJECTIVES

The strategic priorities from the Compliance Program Unit's planning process are inherently about our culture: dynamic, innovative, securing success.

The activities we will highlight and focus on in the next 3 years build on the University's existing strengths that we will leverage and catalyse to demonstrate excellence in staff capabilities, professionalism, performance, and dedication.

Our 3 strategic priorities will foster a culture of inclusive and participatory decision-making within a framework of ethical behaviour as we pursue the highest standards of university governance and accountability.

1. MATURE
a compliance management framework

2. INTEGRATE & IMPROVE
policies and procedures

3. INCREASE
training and awareness

PRIORITY #1 Mature a compliance management framework

KEY AREAS OF FOCUS

- Improving Component 9 of the 12 components of a mature compliance model i.e. controls are in place to managed the identified compliance obligations and achieve the desire behaviours
- Implement a formal electronic non-compliance breach register
- Implement a formal electronic attestation cycle

HOW WE WILL ACHIEVE THE GOAL

1. Maturing from current foundational maturity stage (Level 3) to proactive maturity stage (Level 4). *Note final stage is Level 5.*
2. Meeting with stakeholders (compliance representatives and contacts) in business and academic units to document and create controls to manage compliance risks and obligations.
3. Liaising with regulators (e.g. Audit Office of NSW, Tertiary Education Quality and Standards Agency, Information Privacy Commission, Australian Charities and Not-For-Profits Commission) to ensure best practice and regulator expectation is embedded in controls and process.
4. Implementing a robust information risk and compliance technology platform to enable the breach and attestation register.
5. Obtaining endorsement and buy-in from the University's Audit and Risk Committee to implement the platform and associated processes.

PRIORITY #2 Integrate and improve policies and procedures

KEY AREAS OF FOCUS

- University-wide policies in areas of inductions, conduct, and behaviours
- Modern Slavery legislation
- Conflicts of Interest in related areas such as Board and Board Committees, Procurement, Recruitment, Research etc.

HOW WE WILL ACHIEVE THE GOAL

1. Embedding expectations and standards of compliant behaviours in policies. Examples include consulting with Policy and Governance Unit, owners of the relevant policies, and Talent and Learning Development Unit, and being present and providing meaningful feedback on the Policy DDS for relevant policies. This is to ensure appropriate cross-referencing and training, and calibration of policy statements with efficient and best practice procedure.
2. Assisting in the completion and submission of the University's first Modern Slavery Compliance Statement, ideally by Octobers 2020.
3. Creating and implementing the electronic, enterprise-wide register to record all declarations of conflicts of interest across the University.

PRIORITY #3 Increase training and awareness

KEY AREAS OF FOCUS

- Mandatory training package for University managers / supervisors (i.e. Career Development, Flexible Work, Financial Operations)
- Mandatory training package for all University staff on risk and compliance topics (i.e. Work Health Safety, Fraud and Corruption, Whistle-blower, Privacy etc)
- Other risk and compliance-related areas of interest to other business and academic units (note: these are not mandatory modules across the University but may be mandatory for specific units/roles - e.g. contractor management)

HOW WE WILL ACHIEVE THE GOAL

1. Liaising with and consulting with the Talent, Learning, and Development team, and with risk-related units within the University i.e. Office of Audit and Risk, IT Digital and Risk, Work Health and Safety, Privacy Officer etc, to ensure mandatory training packages are reflective of the appropriate compliance obligations and promote a uniform message or training content where possible.
2. Creating a network of stakeholders who must have a 'seat at the table' to ensure cohesiveness and efficiency in training development, content, and delivery of mandatory training packages, and high-risk.
3. Promoting and encouraging the University's best practice in training as led by the Talent and Development Unit to ensure cohesiveness in the content and its delivery in training.
4. The Compliance Program Unit to attend at least one training session per quarter offered by the Talent and Development Unit via MyCareer Online to create opportunities for broader consultation and obtaining training knowledge across other topics.
5. Utilise other training avenues other than MyCareer Online, such as iMedia for infographics, workshops, factsheets, to deliver training content and ensure compliant behaviour.

2015-2018
ACCOMPLISHMENTS

- Built a compliance management framework based on ISO 19600
    - Developed all 12 Components of a mature compliance model from Level 0 to Level 3 (e.g. compliance policy endorsed by Audit and Risk Committee (Components #1-4); identified and assessed compliance obligations (Component #5); assigned responsibility of compliant outcomes (Component #6)).

- Built compliance and compliance-related policies and procedures:
    - Created Compliance Policy and Compliance Operating Manual
    - Enhanced GIPA-related procedures following Information Privacy Commission desktop audit

- Built compliance and compliance-related training and awareness
    - Created Quarterly Compliance Network with peer universities
    - Created Quarterly Compliance newsletter "Connections"
    - Created training on Compliance Program
    - Implemented mandatory privacy training to all staff
    - Consulted on GIPA training with primary stakeholders i.e. Procurement, Office of Governance Services, ITDS

APPENDIX

COMPLIANCE FRAMEWORK

A compliance framework illustrates the relationship between the strategic and operational components of a compliance program, underlying benchmarks and compliance risk management.

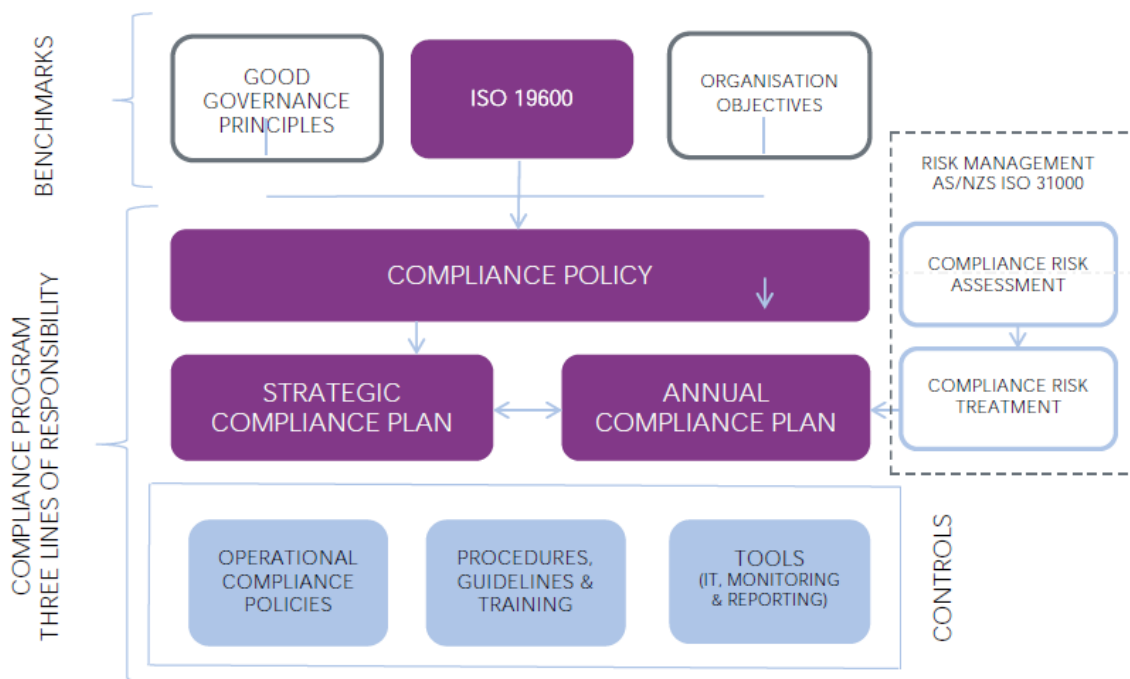The University's compliance framework is best represented by Figure 1.

Figure 1 - Compliance Framework – adapted from the Donselaar model 2011)

COMPLIANCE MANAGEMENT PROGRAM

Western Sydney University developed its Compliance Management Program in 2015. It is based on the international standard ISO 19600. The Program is maintained, and administered by the Compliance Program Unit ("CPU") and headed by the Compliance Program Manager.

Western Sydney University's Compliance Management Program is a set of interrelated or interacting processes at the University to achieve compliance. It is based on the continual improvement principle of "Develop, Implement, Evaluate, Maintain". The University's Compliance Management Program is best represented by Figure 2. The processes in the Program are:

- *Compliance Policy*
- *Compliance Plans* such as 3-year strategic plans, and annual compliance plans
- *Controls* such as operational compliance policies that may or may not be owned/authored by the CPU, such as conflicts of interest, privacy, work health and safety.
- *Procedures, Guidelines, and Training* that provide detailed operational support which may or may not be owned/authored by the CPU. Generally, the CPU primarily acts as a consultant or collaborative partner.
- *Tools* such as Non-compliance Incident Reporting, Annual Attestation, regular reviews, and ongoing monitoring by the CPU.

Figure 2 - Compliance Management Program

THREE LINES OF RESPONSIBILITY

The Framework and Program operates on the three lines of responsibility, best represented by Figure 3.

Figure 3 - Three lines of responsibility