

# FNU Compliance Management Framework

## 1. Introduction

1.1 Compliance is conforming to the requirements of laws, regulations, codes, policies and procedures with which an organisation is required to comply. Compliance management is the ongoing process of monitoring and assessing systems to ensure they comply with industry standards, as well as corporate and regulatory policies and requirements. The purpose of compliance management is about ensuring that the University is aware of its compliance obligation and the potential consequences of non-compliance. Compliance is an integral element for good governance.

1.2 The benefits of an effective compliance framework include:

- Ensures consistency in approach and adherence to legal obligations, policies and procedures
- Establishes regular checks and reviews to validate compliance
- Establishes a process of continuous strengthening of systems and processes
- Provides early detection of weaknesses and timely corrective action to be taken
- Provides integrated compliance analysis and reporting to senior management and the Council's Audit and Risk Committee
- Gives confidence to stakeholders that the University takes its compliance obligations seriously

## 2. FNU's Compliance Management Strategy

### 2.1 Governance and Oversight

- The Council, as the governing body of the University, has overall responsibility for compliance, but the framework will be implemented by everyone.
- The Audit and Risk Committee will oversee the implementation of the framework and processes.
- The Senior Leadership Team will demonstrate ongoing commitment to compliance, and ensure that responsibilities and authorities are assigned and communicated.
- A Register of Compliance Obligations will be created and maintained to identify and record the key compliance requirements for and within the University, and will assign relevant responsibilities for these obligations.

### 2.2 Implementation

- The Senior Leadership Team through an attestation statement will declare compliance to obligations specific to their Division/College.
- FNU will adopt a top down commitment to promote effective compliance practices throughout the University.
- The University will carry out training and awareness programs on compliance issues for staff to be aware and to promote compliance culture within the University.

### 2.3 Continuous Improvement

- The University's Compliance Framework will be reviewed annually and improvements made as part of the review, or whenever deemed necessary.
- Internal and external audit will provide independent assurance on the effectiveness of current procedures and processes.
- Where non-compliance is identified, appropriate steps will be taken to address the breach, implement actions to strengthen the control environment and manage any consequences.

## 2.4 Monitoring

The Department of Risk and Compliance will undertake ongoing monitoring of compliance activities and other areas of the University may undertake specific monitoring where relevant.

## 3. Compliance Management Process

3.1 Compliance obligations include statutory, legal, fiduciary and regulatory obligations that are both internal and external to the University. Compliance obligations will be identified by the Legal Services team in the Department of Risk and Compliance, in consultation with the College/Divisions, and will be divided into the following streams:

- Regulatory and Governance
- Labour and Employment – Human Resources
- Accounting and Finance
- Facilities, Environmental, and Occupational Health and Safety
- Information Privacy and Security
- Technology and Licensing
- Academics and Admission
- Learning and Teaching
- Research and Innovation

3.2 The Compliance Register will be sent to all Divisions and Colleges and all SLT members are to ensure their respective Divisions/Colleges comply with relevant obligations.

3.3 The Compliance Register will be reviewed quarterly by the Department of Risk and Compliance in consultation with the respective Divisions/Colleges and will be updated accordingly. However, if there are updates or amendments to compliance obligations prior to the quarterly review the Compliance Register will be updated accordingly. Fulfilment of compliance obligations will be reflected in job descriptions, work plans and internal policies and procedures.

3.4 All new policies will go through a vetting process with the Department of Risk and Compliance to ensure compliance with statutory, legal, fiduciary and regulatory requirements. Existing University-wide policies, processes, procedures and practices, when reviewed, must be vetted to ensure that compliance obligations are met. The Department of Risk and Compliance will participate in such reviews.

3.5 Any breach of compliance obligations poses a risk to the University. Compliance risks will be captured in the Local and High-Level Risk Registers to ensure the University closely monitors its obligations and minimizes associated risks.

3.6 The University will undertake an annual attestation process; on an annual basis the Senior Leadership Team will complete an attestation statement. The attestation statement is a verification process undertaken to attest compliance with external obligations and with the University's own policies and procedures.

## 4. Reporting of Non-Compliance

4.1 The University encourages the proactive reporting of potential compliance breaches, issues, incidents and complaints. Any non-compliance can be reported through the whistleblower platform, or to the relevant supervisor.

4.2 Staff who intentionally violate the University's compliance obligations may be subject to applicable legislative penalties and/or disciplinary action.

## **5. FNU Compliance Management Policy**

### 5.1 Purpose

The Policy intends to nurture compliance culture within the University. A robust compliance culture and processes are the foundation for a sustainable and successful University. The policy is a reflection of the importance attached by the University's to managing its regulatory risk and reputational risk.

### 5.2 Objectives

- To identify compliance obligations
- To provide a robust framework that continuously review and update business processes to ensure they comply with applicable laws and regulations
- To create effective processes that allow the annual attestation process to take place
- To understand FNU's compliance risks and develop internal controls to mitigate compliance risks
- To assign responsibility to meet specific compliance obligations

### 5.3 Institutional Approach

- The FNU Council is responsible for approving the Compliance Management Framework and Policy. The Council also provides oversight for the management of compliance obligations across the University.
- The Vice-Chancellor and the Senior Leadership Team implement the Compliance Management Framework.
- Deans/Directors are responsible for promoting a compliant culture within their College/Division.

### 5.4 Resources

- The Department of Risk and Compliance (under the Office of the Vice-Chancellor) will maintain hands-on oversight of compliance management.

### 5.5 Role of the FNU Council

- Sets the tone and influences the culture of compliance management within the University
- Annually reviews the institution's approach to compliance management and approves changes or improvements to key elements of its processes and procedures

### 5.6 Role of Audit and Risk Committee

- Reviews the annual attestation statement and reports to Council on the active monitoring and management of compliance obligations across the University.

### 5.7 Role of SLT

- Provides institutional oversight and sets the University's compliance direction through the implementation of the University's Compliance management policy
- Undertake regular reviews of the Compliance Management Framework, policy, procedure and breach reporting processes.

- Ensures that the University manages its compliance obligations by identifying compliance obligations, informing university staff on relevant obligations and ensure that there are appropriate controls to manage compliance risks.

#### 5.8 Role of Deans and Directors

- Comply with Compliance Obligations
- Promote a culture of compliance within their area of responsibility
- Actively participate with the Department of Risk and Compliance to ensure the compliance framework is implemented
- Actively participate with the Department of Risk and Compliance in support of continuous improvement

#### 5.9 Role of the Department of Risk and Compliance

- Promotes the strategy and Policy throughout the University
- Reports on the compliance management process to SLT and the Audit and Risk Committee
- Oversees implementation of compliance management framework
- Compile the Compliance Obligations Register for the University and send to relevant Deans/Directors

#### 5.10 Role of Internal Audit

- Provides management with an assessment, through internal audit reviews, of whether procedures and processes in place to manage compliance obligations are appropriately designed and operating as intended
- Provides feedback to the Audit and Risk Committee on the compliance framework reviewed as part of the annual audit
- Provides assurance on the effectiveness of controls to mitigate compliance risks

#### 5.11 Compliance with the Policy

- All FNU employees must comply with this policy, the policy applies to all activities conducted for the University. All external stakeholders including; vendors, suppliers and contractors must also comply with the policy.

#### 5.12 Training

- The Department of Risk and Compliance will undertake training throughout the University to promote a culture of compliant and also to ensure staff are aware of the implications of non-compliance.

#### 5.13 Review of the Policy

5.13.1 The Department of Risk and Compliance is responsible for the implementation and maintenance of this Policy.

5.13.2 This Policy will be reviewed annually. When significant changes are required, amendments to the Policy will be presented to SLT and the Audit and Risk Committee for approval.