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1 PRELIMINARIES

Commencement

This policy commences on 26 October 2018.

Purpose

This policy and procedure articulates the commitment of the Polytechnic Institute Australia ('PIA') to approaching and managing risk and compliance effectively. It acknowledges PIA's compliance obligations under the Higher Education Standards Framework (Threshold Standards) 2021 and establishes risk and compliance management as integral to responsible business practice and governance.

In particular, PIA recognises that a robust risk management approach:

- supports and facilitates PIA's plans, goals and strategic objectives;
- is a responsibility shared by all PIA's stakeholders, including staff, students, industry partners and affiliates;
- is an essential part of protecting both the reputation of Australian education and the reputation of PIA; and
- provides a safeguard for business continuity and PIA's assets.

Application

This policy and procedure applies to all staff, all students, and all PIA's operations, functions and business activities.



2 DEFINITIONS

The following definitions apply in this document:

Compliance: “adhering to the requirements of laws, industry and organisational standards and codes, principles of good governance and accepted community and ethical standards” (AS 3806-2006, Australian Standard: Compliance programs).

Risk: is “the effect of uncertainty on objectives”, where “an effect is a deviation from what is expected (positive and/or negative), often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood of occurrence” and the uncertainty is “the lack of information about the understanding or knowledge of an event, its consequences and likelihood”. (ISO 31000:2009) Risks can emanate from internal and external sources. Risks can include issues such as student and/or staff dissatisfaction, adverse publicity, physical safety and security concerns, low performing staff, equipment or computer failure, legal and contractual matters and fraud.

Risk Appetite Statement: An internal document specifying the Institute’s risk tolerance across the identified risk areas.

Risk Management: Risk management is the systematic management of activities that involve a material degree of risk of loss or other damage to PIA.

Terms not defined in this document may be in the Risk Management Framework.

3 POLICY

- 3.1 The Institute is committed to the highest level of compliance with relevant legislation, regulations, standards, and codes. The Institute fulfils its compliance obligations through strong governance and leadership, a culture of compliance and a robust set of policies and values.
- 3.2 The Institute will implement effective risk and compliance management practices.
- 3.3 The Institute will maintain and implement policies that promote compliance with relevant legislation, regulations, standards, and codes.
- 3.4 The Institute will maintain a Risk Register and monitor risk in operations and projects according to the Risk Management Framework.
- 3.5 Compliance risks will form part of the Risk Register.

3.6 STAFF OBLIGATIONS

- 3.6.1 Staff must uphold the Staff Code of Conduct and standards of ethical and professional behaviour, and must comply with all applicable legislation, regulations, standards and codes.
- 3.6.2 The Institute will support staff and associates to understand their role in managing compliance obligations by providing education, training and information. Compliance training will be provided to all staff and associates during the onboarding process. Staff



may be required to complete refresher and/or additional compliance training modules in accordance with their role and responsibilities.

- 3.6.3 The Institute will create an environment where staff take responsibility for identifying and managing risk.
- 3.6.4 Staff must report actual or potential breaches of a compliance obligation in accordance with the reporting non-compliance section of the procedures.

4 RESPONSIBILITIES

4.1 The Board of Directors

The Board of Directors is responsible for oversight of compliance and risk management at PIA and ensuring it is appropriately implemented and maintained.

4.2 All PIA Staff

All other levels of responsibility are detailed in the Compliance Management Framework and the Risk Management Framework.

5 PROCEDURES

5.1 Compliance Obligations Register

- 5.1.1 The Institute will maintain a Compliance Obligation Register for the whole institution.
- 5.1.2 The Compliance, Quality and Risk Manager will ensure that compliance obligations are recorded in the compliance obligations register and are managed proactively and proportionately according to current risk exposure and effectiveness of existing controls.
- 5.1.3 The Compliance, Quality and Risk Manager will undertake a risk assessment of current, new or amended compliance obligations and update the register.
- 5.1.4 Members of the Institute's Executive Management Committee are required to complete an annual compliance attestation against their responsibilities in the Compliance Obligations Register.

5.2 Reporting Non-Compliance

- 5.2.1 Any staff member or associate who becomes aware of a contravention of a compliance obligation (legislative or regulatory) that is either notifiable to a regulator and/or external body or represents a significant material non-compliance must:
 - 5.2.1.1 Coordinate immediate action to contain the non-compliance.
 - 5.2.1.2 Ensure evidence that may be valuable for an investigation is maintained and not compromised.
 - 5.2.1.3 Report the non-compliance to the responsible Executive Member.

5.3 Risk Register

- 5.3.1 The Institute will maintain a Risk Register for the whole institution.



- 5.3.2 The Compliance, Quality and Risk Manager will ensure that risks to operations are recorded in the register and are managed proactively and proportionately according to current risk exposure and the effectiveness of existing controls.
- 5.3.3 The headline risks will be reported to the Quality Assurance and Risk Committee each trimester.
- 5.3.4 The Board of Directors will approve the institute's internal Risk Appetite Statement annually.

6 RELATED LEGISLATION AND DOCUMENTS

Institute Documents

- Business Continuity Management Policy and Procedure
- Compliance Management Framework
- Risk Management Framework
- Staff Code of Conduct
- Student Code of Conduct
- Wellbeing and Safety Policy and Procedure

Applicable External Standards and Codes

This policy and procedures support compliance with the following

Standards/Code	Standards/Clauses
Higher Education Standards Framework (Threshold Standards) 2021	6.2

7 FEEDBACK

PIA staff and students may provide feedback about this document by emailing policy@pia.edu.au for such feedback to be incorporated into a future review.

8 POLICY MANAGEMENT

Approval and Review	Details
Approval Authority / Owner (Role)	Board of Directors
Administrator / Responsible for Implementing	CQRM
Approval Date	29 July 2022
Next Review Date	31 December 2025



Document History

Month and Year	Version	Amendments
October 2018	1.0	Policy created and endorsed by Board
July 2022	1.4	Minor changes to formatting and information.
May 2024	1.5	Formatting updated according to the Policy & Procedure Framework