



ANNUAL ATTESTATION FACTSHEET

(Steps 7-12 of the Workflow)

WHAT IS ANNUAL ATTESTATION?

Annual attestation assures the Board of Trustees that there is no material non-compliance of the assigned laws in operating areas that could adversely affect the University's ability to comply with legislative requirements.

Annual attestation is a *tiered approach*, where CCs attest first, followed by CRs based on CCs attestations, then finally DHs attest based on the two previous levels of attestations. The next level of attestation cannot complete their attestation until all of the previous level has attested. The CPU reports to the ARC on any delayed attestations.

 Continuously reviewing the assigned laws, and timely reporting and management of compliance incidences, ensures a smooth attestation process.

WHO IS COLLECTING THE INFORMATION?

The University via the CPU is collecting the information regarding annual attestation.

WHAT IS THE PURPOSE OF THE COLLECTION?

The University is committed to good governance principles, and keeps a record of all its assurance activities, for audit and compliance purposes.

WHO HAS ACCESS TO THE INFORMATION IN THE ATTESTATIONS?

Attestations submitted by CCs, CRs, and DHs can be viewed and accessed by designated officers in the **Office of the University Secretary and General Counsel** (i.e. University Secretary and General Counsel; Compliance Program Unit - University Compliance Manager; Office of Audit and Risk - Director; OUSGC Executive Officer).

It should be noted that external government authorities may request information about Attestations, especially in the event of a significant and/or reportable compliance incident.

ARE ATTESTATIONS ONLY KEPT ON UNIVERSITY SERVERS?

In some circumstances, Attestations may be entered on an online platform maintained by third party vendor, **Protecht**, which administers appropriate administrative, physical, technical safeguards and disaster recovery consistent with the requirements of ISO 27001 for the protection, security, confidentiality, and integrity of the data entered and stored in the Register.

Western Sydney University controls and limits access to the information in the Attestations. The University holds all data in its possession, and administers all data submitted and stored in accordance with its [Privacy Policy](#) and [Privacy Management Plan](#).

Protecht does not (a) modify, (b) disclose except as compelled by law or as expressly permitted by Western Sydney University, or (c) access the data entered and stored in the Register except to provide maintenance services, prevent or address service or technical problems, or at Western Sydney University's request in connection with customer support matters.

HOW LONG WILL INFORMATION IN THE REGISTER BE STORED?

The information in the Register will remain in the Register until the agreement between the University and Protecht is terminated (see next section).

WHEN WILL THE INFORMATION IN THE REGISTER BE DESTROYED?

Upon termination of the agreement the University has with Protecht, the data will be deleted within 30 days of the effective date of termination. A downloadable file of the stored data is made available to the University within the 30-day period. The data entered and stored in the Register will be cleansed from production and back up servers.

WHEN WILL WESTERN SYDNEY UNIVERSITY DESTROY THE INFORMATION PROVIDED FOR THE PURPOSE OF DECLARING CONFLICTS OF INTEREST?

Western Sydney University is bound by the [State Records Act 1998 \(NSW\)](#), and retains Attestation records for 7 years. Note that using the online register does not absolve any retention requirements.

CAN I OPT OUT OF USING THE REGISTER?

Yes, you can opt out of having your Attestation information entered and stored in the Register. This does not absolve the University requirement for compliance assurance, however, and a paper attestation must still be completed by you, and collected, used, and disclosed by the University in accordance with its *Privacy Policy* and *Privacy Management Plan*.

IS THERE TRAINING?

Yes. Training on the Compliance Management Program, of which the Annual Attestation forms part, is available as **MyCareer Online modules** that can be undertaken at any time.

Summary training is offered on the [Compliance Management Program Yammer community](#), or e-updates.

CPU offers live training (via video conference or in-person) on the Program, which may be requested by individuals or invited by the CPU.



General information about the Compliance Management Program is also mentioned in the Manager Training, and Staff Induction training by the Talent, Learning, and Development unit.

OTHER FACTSHEETS

- Compliance Directory & Assignment Factsheet
- Legislative Alerts Factsheet
- Self-Assessment Factsheet
- Continuous Review & Compliance Incident Reporting Factsheet