



# 2025

# COMPLIANCE HANDBOOK

Learn more about the Compliance Program Unit at  
Western Sydney University -  
*what we do and what we can do to help*

EMBODYING THE  
RIGHT  
BEHAVIOUR AND  
DOING THE  
RIGHT ACTIONS  
IN THE RIGHT  
SPIRIT

# Welcome Message



**Keira Hamilton**

*Director*

As the Director of the Compliance Program Unit, for Western Sydney University and its controlled entities, I am pleased to introduce, through this Handbook, the mission, core values, and key accountabilities of our Unit.

While this Handbook is “in a nutshell”, the compliance

culture instilled in all staff and our operations is vast and deep.

The Compliance Program Unit believes successful compliance culture results in compliant outcomes - and that is built on open communication and collaboration.

Our Unit partners with operational units in effectively understanding both regulatory obligations and enterprise requirements (such as conflicts of interest management).

Through our key accountabilities, we seek to empower each of you to make informed, ethical decisions, having safety, fairness, and inclusivity as both the intention and impact.

By providing this Handbook, we welcome you to understand what we do so you may call upon us as a resource for guidance and support in protecting the University, its students, and the wider community.

# Organisational Structure



# CPU Overview



## About Us

Since 2016 , the Compliance Program Unit has applied a “common sense” approach to the development and maintenance of the Compliance Framework with minimal disruption to daily operations.

### **Our Vision** *is guided by* **Our Values**

Secure, demonstrate, and continue a culture of integrity and socially responsible behaviour though:

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

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### **Our Mission** *is achieved through* **Our Strategy**

Enable and assure of the management of compliance to protect from legal, reputational, and financial risks by:

- Connecting
- Collaborating
- Calibrating
- Communicating

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### **Our Objectives** *are realised in* **Our Action Plan**

- Implement a positive compliance culture.
- Integrate policies and procedures.
- Initiate training and awareness.
- Improve design effectiveness of controls.
- Increase repository of compliance and control evidence.

# Key Accountabilities

## WHAT DO WE TAKE CARE OF?



### 01 Regulatory Compliance Program

Execute processes to enable and assure of operational compliance with applicable NSW and Commonwealth legislation.

### Enterprise Conflicts of Interest

Maintain the framework of the management of conflicts of interest to ensure impartiality of staff when performing official duties.

### 02



### 03 Enterprise Gifts & Benefits

Maintain the framework of the acceptance of gifts and benefits to prevent any undermining of trust as a publicly accountable organisation.



# Key Accountabilities

## WHAT DO WE TAKE CARE OF?



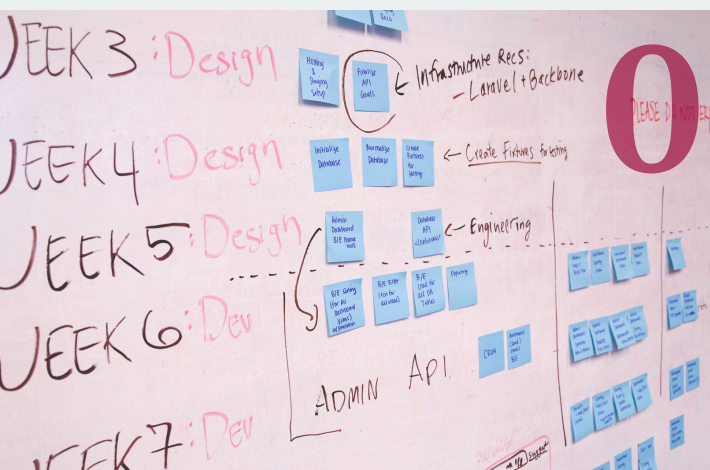
### 04 Legal & Compliance Training Program

Facilitate training and awareness of topics in a legal and regulatory context that are beneficial to staff and operations.

### Modern Slavery Statement Upload

Ensure the annual Modern Slavery Statement addresses all key criteria and is uploaded to the Government Portal by the due date.

### 05



### 06

### Special Projects

Drive and implement Enterprise-initiatives and special projects such as National Redress Scheme onboarding, and annual declarations for Board, Board Committee, and Controlled Entity directors.

COMPLIANCE IS  
NOT A GOAL OR  
AN ASPIRATION

-

IT IS A RESULT  
AND AN  
OUTCOME

# What To Expect

## What to Expect From US

- Support staff in understanding and meeting their regulatory and integrity compliance goals.
- Develop a culture of understanding compliance within daily business.
- Apply a practical approach to developing effective compliance controls and processes.

## What We Expect From You

- Retain the accountability for compliance even for activities that are outsourced to third parties.
- Be individually responsible for their own awareness of, and compliance with, applicable laws and policies.
- Embed compliance obligations in policies, procedures, and practices.
- Report and manage Compliance Incidents.

The University is committed to complying with all relevant Commonwealth and NSW laws, and enterprise controls relating to its governance and operations. In particular, the University recognises its obligations to its students, its staff, and the wider community to provide a safe environment that adopts the highest standards of accountability.



# Fast Facts

## ABOUT OUR COMPLIANCE DIRECTORY

### FACT 1



There are **165** pieces of legislation on the Compliance Directory

### FACT 2



There are **76** NSW, **81** Commonwealth, and **8** other State/Territory-based legislation

### FACT 3



We have the most (**28**) laws in the Tax, Finance & Procurement category

### FACT 4



We have the least (**2**) laws in the Trade & Commerce category

### FACT 5



We have **87** pieces of legislation on our Watchlist

### FACT 6

Watchlist items include:

- A Bill awaiting assent
- An Act awaiting commencement
- International / voluntary instruments
- Acts that set up authority (no proactive obligation) or provide an exemption

## **ANATOMY ACT 1997 (NSW)**

**Why?** Because we have an Anatomy Facility including a five-place dissection room, an embalming room, and dissected specimens storage room.

## **CIVIL AVIATION ACT 1998 (CTH)**

**Why?** Because we fly unmanned aircrafts (drones) which must be regulated in terms of flight height zones and proximity to crewed aviation.

# **4 INTERESTING LAWS WE COMPLY WITH - AND WHY**

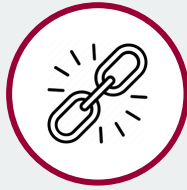
## **BIOSECURITY (NATIONAL LIVESTOCK IDENTIFICATION SYSTEM) REGULATION 2017 (NSW)**

**Why?** Because we have a Farm that contains livestock which we purchase and onsell.

## **WORKPLACE GENDER EQUALITY ACT 2012 (CTH)**

**Why?** Because we are a relevant employer who contributes information to the world-leading dataset on gender equality in Australlia.

# 5 Questions We Ask TO HELP YOU ASSESS CONFLICTS OF INTEREST AND GIFTS & BENEFITS



**1**

Does the WSU representative have a personal interest?

**2**

Does the WSU representative have an official University duty?

**3**

Is there a connection between the personal interest and the public duty?

**4**

Could a reasonable person perceive that the personal interest might be favoured?

**5**

Does this gift/benefit create a sense of obligation or influence from the WSU representative (the recipient) to the giver?



# Training sessions we've offered



Foreign Bribery Offences



General Fraud & Corruption  
Controls



Executive Liability in a heavily  
regulated sector



Navigating the Regulation of AI



Defamation Act & Disability  
Discrimination Act



Higher Education Sector -  
Pre and Post Accord

COMPLIANCE IS  
THE JOURNEY  
AND THE  
DESTINATION

# Compliant Champion Checklist

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## CONNECT

Undertake all relevant training and awareness including reviewing the Compliance Directory of applicable laws.

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## CALIBRATE

Ensure compliance records including evidence are easily accessible for auditing purposes.

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## COLLABORATE

Share and promote compliance information within your team, with your manager, and with Senior Executives if applicable.

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## COMMUNICATE

Report any non-compliance incidents to the Compliance Program Unit.

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*thank you  
for contributing to a positive, proactive & embedded compliance culture*

# Contact Us

The CPU is located on Parramatta South campus,  
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