



COMPLIANCE PROGRAM UNIT HANDBOOK

Learn more about the
Compliance Program Unit
at Western Sydney University

WHAT WE DO

**WHAT WE CAN DO
TO HELP**

*read more on the compliance pages at
<https://www.westernsydney.edu.au/ougc/cpu>*

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 at Western Sydney University and its controlled entities, I am pleased to introduce this Handbook, outlining the mission, core values, and key accountabilities of our Unit.

While this Handbook provides a concise overview, the compliance culture embedded across our

University is extensive and deeply integrated into our operations.

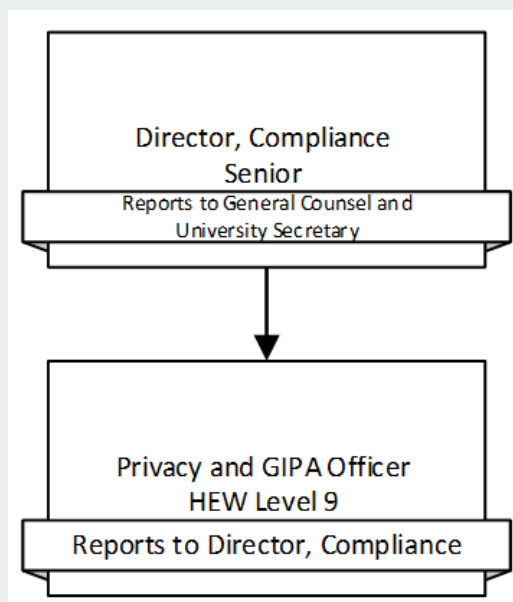
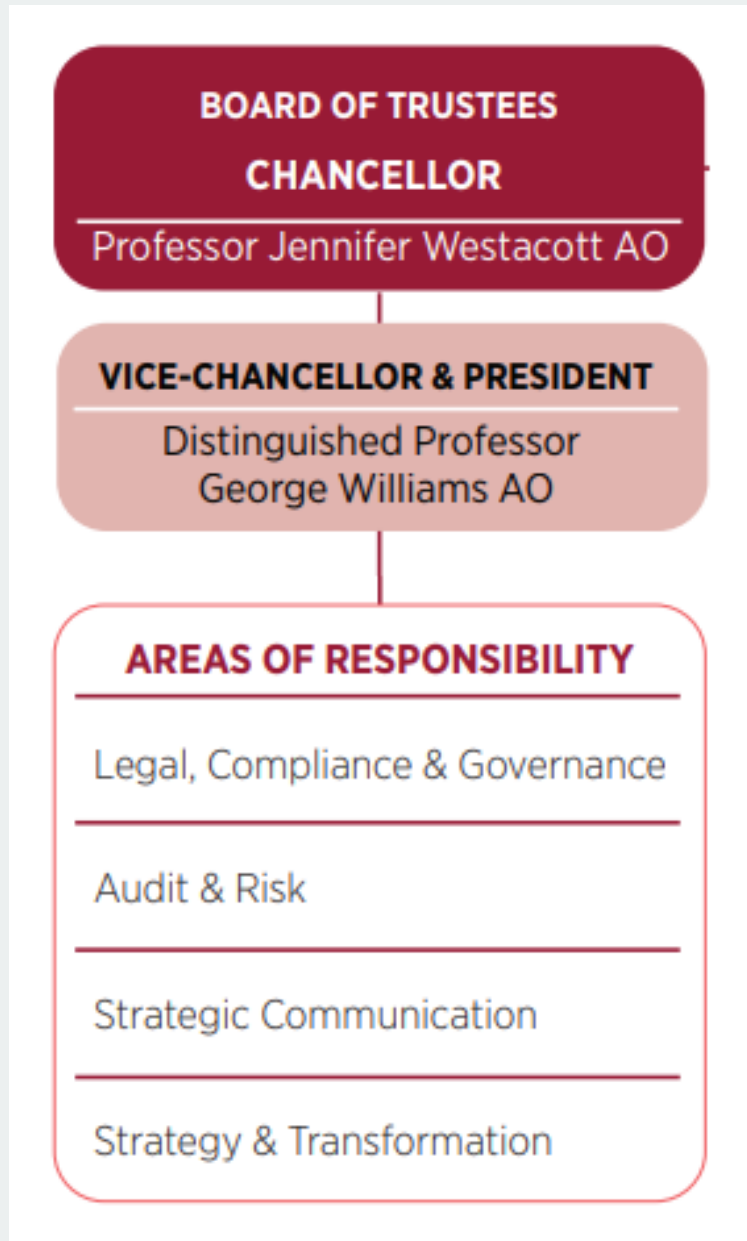
We believe that a strong compliance culture enables compliant outcomes - built on open communication, collaboration, and shared accountability.

Our Unit partners with operational areas to support understanding of both regulatory obligations and enterprise requirements (such as conflicts of interest management), ensuring these are effectively embedded in practice.

Through our key accountabilities, we aim to empower informed and ethical decision-making, with safety, fairness, and inclusivity guiding both intent and impact.

We encourage you to use this Handbook as a resource and to engage with us for guidance and support in protecting the University, its students, and the wider community.

Organisational Structure



CPU Overview



About Us

The purpose of the Compliance Program Unit is to enable and assure of legislative operational compliance within the University's accountable units.

Our Vision

is guided by

Our Values

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

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

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

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.

What To Expect

What to Expect From US

- Support staff to understand and meet regulatory and integrity obligations.
- Foster a culture where compliance is understood and embedded in day-to-day operations.
- Apply a practical, risk-based approach to the design and implementation of effective controls and processes.

What We Expect From You

- Retain accountability for compliance, including where activities are outsourced to third parties.
- Take responsibility for understanding and complying with applicable laws, policies, and procedures.
- Embed compliance obligations into policies, procedures, and day-to-day practices.
- Identify, report, and support the management of 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.



Meet The Team



The team is based at Parramatta South campus.

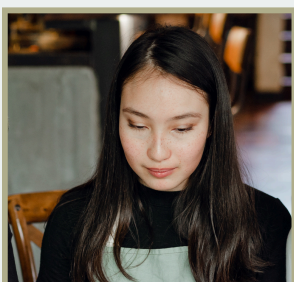


Keira Hamilton

Director, Compliance

BMedia/LLB

Western Sydney Employee since 2015



Rhyannon Bechara

Privacy and GIPA Officer

BBus

Western Sydney Employee since 2019

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.

Privacy Compliance

Independently oversee and recommend control mitigation strategies to ensure privacy risks are identified, managed, and monitored in line with legislative requirements.

02



03

GIPA Compliance

Independently assess and determine access to information applications, applying public interest considerations to ensure lawful, fair, and transparent outcomes.

Key Accountabilities

WHAT DO WE TAKE CARE OF?



04 Enterprise Conflicts of Interest

Maintain a framework for managing conflicts of interest, enabling staff to identify, disclose, and report conflicts, and ensuring they act impartially in the performance of their official duties.

Enterprise Gifts & Benefits

Establish and maintain a framework governing the acceptance of gifts and benefits to prevent actual or perceived conflicts of interest and maintain public trust in the University's integrity.



06 Legal & Compliance Training Program

Deliver and facilitate targeted training and awareness on legal and regulatory topics, in partnership with external law firms, to strengthen staff capability and support operational compliance.



Fast Facts

ABOUT OUR COMPLIANCE DIRECTORY

FACT 1



There are **170** pieces of legislation on the Compliance Directory

FACT 2



There are **78** NSW, **84** Commonwealth, and **8** other State/Territory-based legislation

FACT 3



Majority in commercial/ operational domains (**Tax/Finance + Property**)
Strong research compliance footprint (**Research Ethics & Integrity**)

FACT 4



Environmental + employment risk clusters are prominent
Legal areas are comparatively low volume but high impact.

FACT 5



We have **104** 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.

Privacy & You

How we work with you to *Collect | Respect | Protect*

We build trust through the protection of personal information and the promotion of integrity and ethical practices across the University.

The Privacy Officer role

- Provide advice on privacy principles and obligations
- Manage and respond to privacy complaints and enquiries
- Assess and support the management of privacy risks
- Deliver training to build a privacy-aware culture



Your Role

- Refer to the Privacy Management Plan to understand your obligations
- Verify recipients before sending emails or sharing information
- Complete Privacy Impact Assessments where required
- Report suspected or actual privacy breaches promptly

Your Privacy Checklist

Do I need to collect this information?

Is the collection notice clear, informed, and specific?

Am I using the information only for its intended purpose?

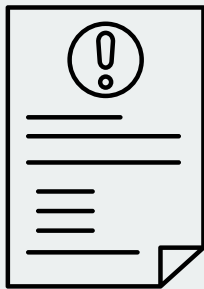
Is consent required, and has it been obtained where necessary?

Is the information secure from unauthorised access or disclosure?

Am I retaining the information only for as long as necessary?

GIPA at a Glance

How we work with you to ensure
Access / Transparency / Accountability



What we do

ASSESS access applications by applying the public interest test, balancing transparency and privacy in the disclosure of information.

What you do

SEARCH for information by undertaking thorough and reasonable searches within the scope of the access application to identify records and confirm whether they are held by the University.

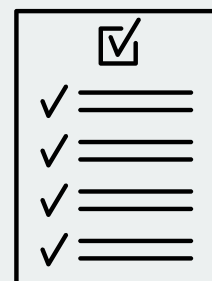


What you do

PROVIDE information to the GIPA Officer promptly and in full. Do not redact or alter records - any redactions or decisions regarding disclosure are determined by the GIPA decision-maker.

What we do

DECIDE on access applications by issuing clear, reasoned decisions, weighing factors for and against disclosure under the public interest test.

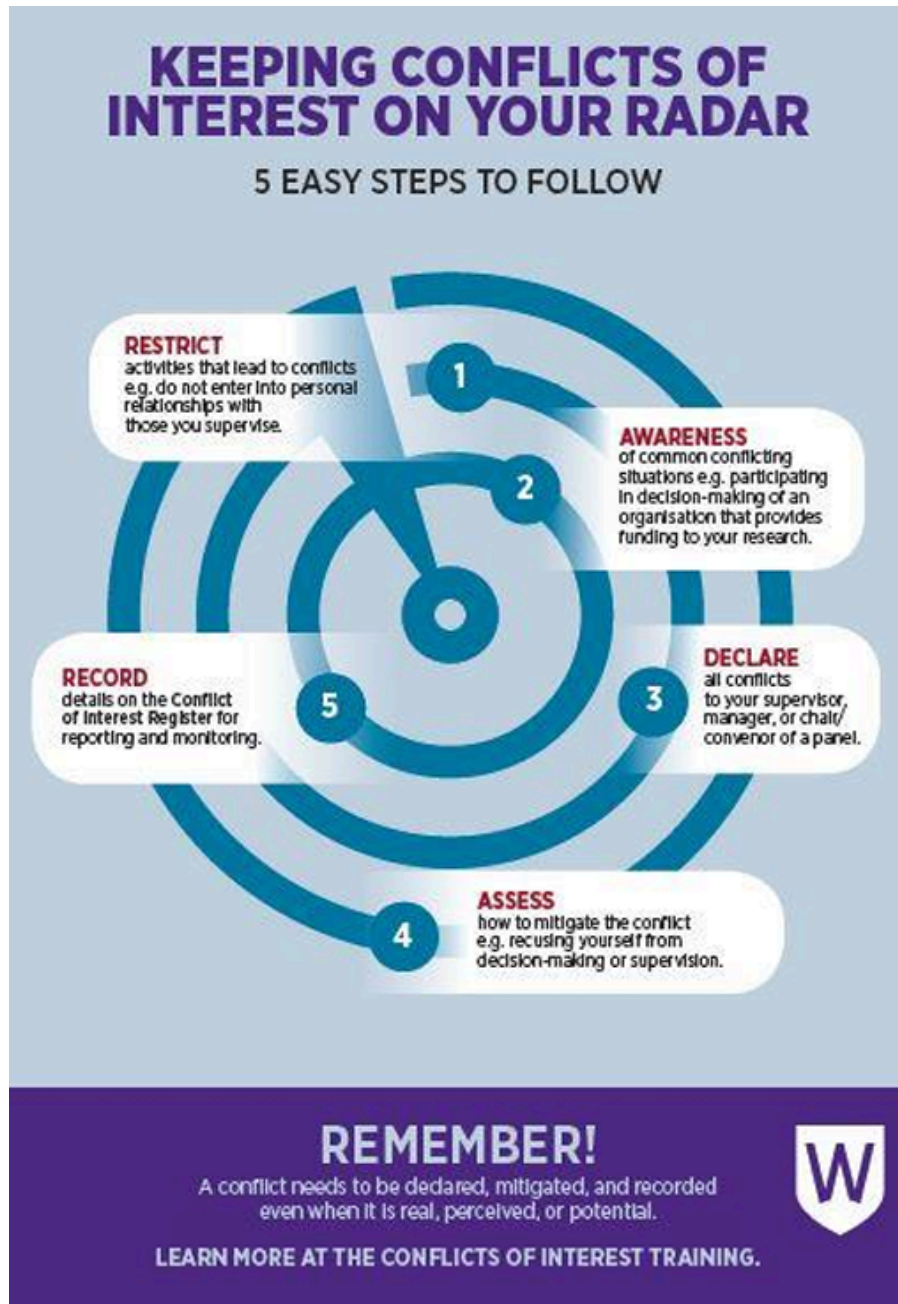


COMPLIANCE IS
NOT A GOAL OR
AN ASPIRATION

-

IT IS A RESULT
AND AN
OUTCOME

Integrity Compliance



How We Help You

- **ENABLE** a clear framework for identifying, declaring, and managing conflicts of interest and gifts and benefits across the University.
- **ADVISE** staff on appropriate management strategies and actions, including whether to accept, decline, or manage gifts and benefits.
- **MAINTAIN** the Integrity Reporting Register.

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

Compliant Champion Checklist



CONNECT

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



CALIBRATE

Ensure compliance records, including supporting evidence, are maintained and readily accessible for audit and assurance purposes.



COLLABORATE

Share and promote compliance information within your team, with your manager, and with Senior Executives where appropriate.



COMMUNICATE

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

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

Contact Us

The CPU is located on Parramatta South campus,
Building EQ, Level 1.

What do you need to know?	Who to contact
<i>compliance program, conflicts of interest, gifts and benefits, modern slavery, applicable legislation</i>	compliance@westernsydney.edu.au
<i>collection notices, consent forms, privacy impact assessments, internal reviews</i>	privacy@westernsydney.edu.au
<i>access to information enquiries, GIPA applications</i>	rti@westernsydney.edu.au



COMPLIANCE IS
THE JOURNEY
AND THE
DESTINATION



Your key compliance actions

- Report regulatory compliance incidents and issues
- Report actual or suspected privacy breaches
- Complete Privacy Impact Assessments (PIAs) where required
- Declare and record conflicts of interest (including NIL declarations)

KNOW

ACT

ASSURE