

Background

Why is some compliance training compulsory?

Compliance training helps us understand the legal context within which we work. Understanding our basic legal obligations helps us all lead by example, act with due care and provide excellence in customer service. This training helps educate staff- on the laws, regulations and codes that pertain to their work and - demonstrates to regulators, accrediting organisations and our community that at Curtin we take compliance seriously and hold ourselves accountable for our actions and behaviours. We also use the training completion reports to enable us to pre-qualify for industry contracts (*Health and Safety*) and in audits and investigations, to review whether we have been clear in our expectations of staff.

At Curtin we have a Compliance Officer for each key piece of legislation:

<https://policies.curtin.edu.au/legislation/externallegislation.cfm>

Regular monitoring and measuring takes place to ensure Curtin is compliant with the legislation. As part of this assessment, Compliance Officers determine which controls are necessary to manage the risk of non-compliance. A common control is compliance training. There are over 30 pieces of key legislation that Curtin must comply with. There are 5 mandatory online compliance training courses that all staff are required to complete. A Compliance Officer will take into account the following factors when recommending to the Director, Compliance Services whether compliance training should be mandatory:

- Legislation requires we are able to demonstrate all staff have undertaken training (*Health and Safety Act, State Records Act, State and Commonwealth Equal Opportunity and Anti-Discrimination legislation*)
- As part of our culture we believe it is necessary that staff understand the expectations of the behaviour required of them, particularly where failure to behave in that manner may have significant disciplinary consequences (*Code of Conduct*)
- The Act touches on a number of common activities at Curtin that have significant consequences for non-compliance (*Competition and Consumer Act*)
- Recommendations from audits (*Competition and Consumer Act*), investigations (*Code of Conduct*) and external regulator
- The potential cost to Curtin of staff not undertaking the training i.e. the compliance risk and the cost to Curtin of staff undertaking the training including materials and the estimated time for each staff member to complete the training.

Apart from managing our compliance risk this training helps us make informed decisions, and one could ask the question – ‘why wouldn’t you want to do this training?’

Code of Conduct - this helps us understand the behaviour that is acceptable, and conversely not acceptable. Knowing this helps build a shared understanding of our culture at Curtin.

Health and Safety Act - this helps us avoid hurting others. Council have determined it has a low risk appetite for poor health and safety practices. See

http://riskmanagement.curtin.edu.au/risk_management/index.cfm

And if that doesn’t have your interest, under the Health and Safety Act, you can be personally liable for breaches. For more information on that check out the compliance training or visit

http://riskmanagement.curtin.edu.au/risk_management/index.cfm

State Records Act - our intellectual property and important corporate information is a record. Understanding how to look after it helps us access and use it when we need it.

State and Commonwealth Equal Opportunity and Anti-Discrimination legislation - at Curtin we value diversity and promote equity and inclusion in the way we behave. Discrimination can be direct or indirect, overt or subtle and sometimes we aren't aware that the way we behave or the rules we put in place could be discriminatory. It's important to have a refresher of what we need to know.

Competition and Consumer Act - we have a special relationship with our students and future students. We need to be mindful of what and how we convey information to students so we don't unintentionally mislead them. The same is the case when we are negotiating contracts with potential partners. There's a lot more to the Competition and Consumer Act than just representations. For more information you can go to the Key Legislation page and look at the Essential document for *Competition and Consumer Act*:

<https://policies.curtin.edu.au/legislation/externallegislation.cfm>

As a staff member you want to know you are doing the right thing and as a manager you want to be able to demonstrate you've helped the staff who report to you to understand what our expectations are.

What is Compliance Lite?

We recognise that different categories of staff have differing levels of interaction and activities involving students, staff and the University community. Accordingly we have attempted to re assess the risk for staff who have limited levels of interaction with students, other staff and the University community at large. These staff may not require a detailed knowledge of compliance requirements however it is still important that they are aware of the key information with regards compliance at Curtin. Staff in these categories have been assigned a "Lite" version of compliance training.

The determination as to who completes the 'Lite' version is made by the Compliance Officer for that specific training and is based on staff categories, roles and responsibilities.

The introduction of Compliance Lite – To identify the categories of staff eligible for the Lite version and to assign this training appropriately, the following work was undertaken:

- determining the criteria for Lite users
- identifying and categorising staff who qualified as a Lite users in Alesco/iPerform
- removing the Full version of the Compliance training assigned to any Lite users
- assigning the Lite version appropriately
- The Lite version was launched on the 10th of September

How are the -resit periods determined?

We have selected resit periods based on a number of factors including legislative and accreditation requirements, reporting periods and Curtin's management of its compliance agenda. For example, if Curtin wishes to be considered as an Employer of Choice we must be in a position to report that all staff have completed compliance training on our commitment and obligations to EEO every two years. In other cases we need to be able to demonstrate that regular training has been undertaken. Re sitting training is not uncommon as many professions require practitioners to demonstrate ongoing professional development.

The reports you can get - This is managed by the Organisational Development Unit, iPerform the Director, Compliance Services and the Compliance Officers responsible for Curtin's compliance training requirements. The iPerform Learning Management System (LMS) is the source for data used to compile the reports on completion and non-completion of compliance training.

As a staff member, if you are required to complete either a 'Full' or 'Lite' version of the compliance training courses in iPerform, the following will occur:

- When you have been assigned a compliance course in iPerform, you will receive an email notifying you that you have been registered for the training. You will have 8 weeks to complete this training.
- 2 weeks prior to the due date, you will receive a reminder email that your training is due
- 1 week prior to the due date, you will receive another reminder email
- If you have still not completed the training, 2 weeks after the due date has passed, your manager will receive an email advising that your compliance training is overdue.

Reports will be sent to Executive Managers on the first of every month detailing staff in their area who have *not* completed the required compliance training.

The iPerform system is in the early stages of implementation and we are still refining our reports. We welcome feedback you have on how we can better tailor the reports for your needs. If you would like to meet with us please contact Lucille Rowland, Instructional Designer Organisational Development Unit or Naomi Yellowlees, Director, Integrity, Standards and Compliance Services. You can also lodge a request by emailing iPerform

What to do if you have staff on extended leave and you keep getting notifications about their training- you can request a deferral of their compliance training completion date through iPerform.

For other queries on the training, please go to the iPerform:

<https://staffportal.curtin.edu.au/wps/myportal/staff/people-and-culture/working/new-staff/career-development>

Reporting on Compliance Training to Planning and Management Committee and Audit and Compliance Committee

A *Compliance Update* paper is provided to the Planning and Management Committee and the Audit and the Audit and Compliance Committee in February/March and October each year. The difficulties with getting accurate reports on previous compliance training completions and lack of system tools to improve the completions were reported through these committees and lead to the incorporation of compliance training through iPerform. Success and challenges in the performance of Curtin against the 100% compliance training requirement are reported to these committees.