

COMPLIANCE MANAGEMENT POLICY

- Intent** The purpose of this policy is to ensure Council is committed to a centre-led approach to compliance management and embedding a proactive culture of compliance across the organisation.
- Scope** This policy applies to all employees of the council. The policy also applies to contractors, consultants, volunteers and temporary staff that may be considered workers within council's work environment.

PROVISIONS

1. Council is committed to complying with relevant legislative obligations, industry standards and codes together with Council's own local laws, policies and procedures. Effective legislative compliance is an essential part of good corporate governance, supports good decision-making, builds community trust and is driven by a proactive compliance culture.
2. Council's compliance framework is underpinned by a risk-based, centre led approach that aims to ensure effective compliance management across all areas of the organisation. This will enable Council to proactively identify issues, manage compliance risk, assure accountability and maintain a high level of transparency.
3. Council's compliance culture is supported by Council's risk appetite statements, compliance management requirements and Code of Conduct for employees. All leaders are responsible for promoting behaviours that create and support compliance and uphold a culture of open disclosure of non-compliance without fear of reprisal.
4. Council is committed to:
 - a. Adopting a Compliance Management Framework that is consistent with the Australian Standards AS/ISO 37301:2023 Compliance Management Systems.
 - b. Ensuring legislative obligations are identified and assessed and responsibility for compliance are clearly articulated and assigned.
 - c. Maintaining effective compliance management systems and tools including legislative obligations registers that capture key information that will ensure Council has a thorough understanding of its obligations, assessment of compliance, controls and actions planned.
 - d. Applying a risk-based approach to monitoring compliance which supports prioritisation and concentrates on compliance focus areas aligned to Council's enterprise risk appetite.
 - e. Developing a positive compliance culture through awareness, education and training for team members to enable understanding of compliance obligations and required management actions.
 - f. Ensuring that non-compliance reporting pathways are documented, understood and accessible to all team members.
 - g. Monitoring and reporting on compliance to identify potential breaches or system failures.
 - h. Promptly addressing identified breaches or other non-compliances to mitigate Council's exposure to legal, financial or reputational risk.
 - i. Ensuring accountability for non-compliance is enforced where appropriate.
 - j. Monitoring and improving compliance management practices through a program of continuous improvement.

5. Legislative updates and changes

Council will ensure adequate processes are in place to ensure that timely advice is provided to team members regarding changes to compliance obligations and good governance practices by:

- a. Maintaining arrangements with legal advisors;
- b. Continuing memberships with professional bodies;
- c. Subscribing to relevant information services;
- d. Monitoring the Department of Local Government, Local Government Association of Queensland and other regulator's websites; and
- e. Attending industry forums, conferences, workshops and seminars.

6. Compliance management reporting

Council will ensure that reportable and notifiable breaches are reported to the relevant regulatory authority as required. Compliance trends and non-compliance will also be periodically reported to Council's Audit Committee and the Executive Leadership Team where appropriate.

7. Non-compliance management

Council will apply the principle of procedural fairness (also known as natural justice) when dealing with non-compliance under this policy. All parties to an instance of non-compliance will receive equal opportunity to voice their individual concerns. In applying the principles of procedural fairness, Council decisions will be made objectively and impartially and without bias on a case by case basis.

RELATED DOCUMENTS

This Policy complements and is to be implemented in conjunction with other Council policies, directives and relevant documents published by other agencies including, but not limited to:

- Compliance Management Framework (DM#7477579)
- Audit Committee General Policy
- Fraud General Policy
- Risk Management General Policy
- Work Health and Safety General Policy
- Code of Conduct for Employees
- Australian Standard AS ISO 37301:2023: Compliance Management Systems
- Australian Standard AS ISO 3100:2018 Risk Management Guidelines

◆◆◆◆◆

This policy is to remain in force until otherwise determined by Council.

Director responsible for Review:

People and Organisational Performance

ORIGINALLY ADOPTED: 28/08/2024

CURRENT ADOPTION: 28/08/2024

DUE FOR REVISION: 28/08/2028

REVOKED/SUPERSEDED: {Enter Date}



**John Andrejic
A/CHIEF EXECUTIVE OFFICER**