1. Definitions
Please refer to the University’s Glossary of Terms for policies and procedures.

2. Purpose of procedures
The procedures that follow outline the processes for managing actual or potential breaches of the University’s compliance obligations. These procedures must be read in conjunction with the Compliance Management Framework – Governing Policy and other related procedures.

The intent of these procedures is to:

a) provide a systematic process for the reporting and investigation of compliance breaches or potential breaches so they can be appropriately addressed;

b) reinforce the importance of compliance, so that all staff members are encouraged to proactively raise compliance issues as soon as possible and address any weaknesses in the control environment(1);

c) enable the gathering of information to facilitate monitoring and reporting of compliance performance within the University; and

d) ensure that no staff member is penalised or disadvantaged as a result of reporting a compliance breach and that repercussions of breaches themselves are determined on a case-by-case basis.

3. Exclusions
3.1 A number of processes are established across the University to manage complaints relating to compliance or breaches of laws and regulations, and these are dealt with at the operational management level, and covered in various University policies, such as:

a. Staff Code of Conduct – Governing Policy
b. USC Enterprise Agreement
c. Health, Safety and Wellbeing – Governing Policy
d. Incident Management – Governing Policy
e. Anti-Discrimination and Freedom from Harassment – Governing Policy
f. Equity and Diversity – Governing Policy
g. Fraud and Corruption Control – Governing Policy
h. Financial Management Practices – Managerial Policy
i. Information Management Framework – Governing Policy
j. Public Interest Disclosures – Governing Policy
k. Acceptable Use of Information Technology Resources – Governing Policy
l. Research Misconduct – Governing Policy
m. Student Academic Integrity – Governing Policy
n. Copyright – Managerial Policy.

3.2 Any University policy or legislation that includes dedicated processes for handling compliance failures will take precedence over the following procedures. Please refer to the specific subject area policy or legislative provisions in the first instance.

4. Procedure steps and actions
4.1 It is essential that all parties involved in breach reporting, investigation and rectification act in good faith to obtain a satisfactory outcome. Good faith includes acting sincerely, without malice and being truthful.

4.2 No blame should be attached to the reporting of accidental breaches or those identifying process errors.

4.3 It should be noted that staff committing deliberate or negligent breaches may be subject to the University’s disciplinary processes or regulatory/criminal actions (where applicable and/or appropriate).

4.4 The required steps and actions to be followed for reporting and investigating compliance breaches, or potential breaches, are detailed in Table 1 below:
<table>
<thead>
<tr>
<th>Procedure (Including Key Points)</th>
<th>Responsibility</th>
<th>Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Initial identification and notification</td>
<td>Staff member who notices the breach or potential breach / failure (Supervisor/Cost Centre Manager)</td>
<td>Immediately or as soon as practicable</td>
</tr>
<tr>
<td>2. Breach containment</td>
<td>Supervisor/Cost Centre Manager</td>
<td>Immediately or as soon as practicable</td>
</tr>
<tr>
<td>3. Breach assessment and escalation</td>
<td>Cost Centre Manager</td>
<td>Immediately or as soon as practicable</td>
</tr>
<tr>
<td>4. Investigation and reporting</td>
<td>Cost Centre Manager where breach occurred (Chief Operating Officer/Chief Risk Management Officer/Chief Information Officer/Vice-Chancellor and President)</td>
<td>Commence investigation immediately after the breach has been assessed and contained</td>
</tr>
<tr>
<td>5. Implementation of corrective action</td>
<td>Cost Centre Manager where the breach occurred</td>
<td>As recommended or agreed</td>
</tr>
<tr>
<td>6. Breach recording/register</td>
<td>Chief Operating Officer</td>
<td>Continuously</td>
</tr>
</tbody>
</table>

Table 1: Breach Reporting Procedures
Management Framework – Governing Policy and associated procedures. b. The register will include a full record of all reported breaches/potential breaches, investigations, corrective actions undertaken, and include breaches referred for external resolution.

Footnotes:
(1) Compliance issues refer to those instances where there are concerns about the University’s compliance with legislative obligations.
(2) Significant breaches are those where a significant incident has occurred regarding the University’s compliance obligations.

END