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## 1. INTENT

- 1.1 The purpose of this Policy is to confirm that Edith Cowan College ('ECC' or the 'College'): has systems in place to:
- a) meet Compliance obligations by assigning responsibility and preventing non-Compliance;
  - b) uphold good academic and corporate governance practices;
  - c) apply robust Risk management to all strategic and operational activities to ensure effective compliance with regulatory obligations and achievement of College objectives;
  - d) Develop and support Quality Assurance through policies, principles, attitudes, actions and procedures that assure quality through a continuous improvement philosophy; and
  - e) plans for and provides quality education across its operations.
- 1.2 Health and safety risks and hazards are a specific of category of Risk which is managed under the [Wellness, Health and Safety Policy](#) and the [Wellness, Health and Safety Procedures](#), in order to meet legislative requirements.
- 1.3 Critical Incidents are a specific category of Risk and are managed under the [Critical Incident and Business Continuity Policy](#).
- 1.4 ECC's [Privacy Policy](#) and Privacy Statement outline how the College acts in a manner that reflects principles outlined in the [Privacy Act 1988](#) and the [Australian Privacy Principles](#)
- 1.5 This Policy is designed to be consistent with the AS 3806-2006, AS ISO 19600:2015, ISO 31000:2018, and ISO 19600:2014 (E).

## 2. ORGANISATIONAL SCOPE

- 2.1 This Policy applies to all Staff at ECC and its Partner Providers.

## 3. DEFINITIONS:

- 3.1 The [Glossary of Policy Terms](#) applies to this Policy.
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### 4. POLICY CONTENT:

- 4.1 ECC is committed to conducting its business and activities ethically and lawfully, and to complying with all regulatory obligations including:
- a) legislative requirements;
  - b) regulatory policies;
  - c) government stipulations;
  - d) industry codes and standards;
  - e) ECC Policies and Procedures; and
  - f) Navitas and ECU Policies and Procedures policies to which the College is subject.
- 4.2 ECC aims to achieve its goals and objectives through the implementation of the **Quality, Risk and Compliance Framework** (see Figure 1), which has four main components:
- a) **Governance:** the overall management of ECC's Corporate and Academic functions;
  - b) **Compliance:** the process by which ECC adheres to laws, regulations and standards;
  - c) **Risk Management:** the prediction and management of Risks that could prevent ECC from meeting its objectives; and
  - d) **Quality Assurance:** the cycle of continuous improvement through which the ECC remains Compliant, mitigates Risk and demonstrates good Corporate and Academic Governance.

**Figure 1. Quality, Risk and Compliance Framework**



### Compliance

- 4.3 At ECC, Compliance will be **continuous**:
- a) monitoring legislative instruments will be ongoing;
  - b) systems and processes will be updated to reflect changes in requirements; and
  - c) systems and processes will be embedded to reflect change and support predictability.
- 4.4 At ECC Compliance will be **engaged**:
- a) Senior Management will be committed to a culture of transparent and collaborative Compliance practice;
  - b) Compliance leads will be participating stakeholders in design and analysis of process development and review;
  - c) Staff will be actively involved in collaborative functional teams through integration and collaboration across and between functional teams; and
  - d) regular training and awareness updates will ensure ongoing understanding of Compliance obligations.
- 4.5 At ECC Compliance will be **contextualised**:
- a) Compliance practices and solutions will be developed according to specific context and needs, to enable solutions to fit local and cross-jurisdictional requirements as and when the need arises;
  - b) local (external) social, political and economic conditions and (internal) governance and ethical requirements will impact how Compliance solutions balance competing rights, obligations and /or policies; and
  - c) Compliance 'by design' will enable and support data-driven decisions to support innovation in institutions facing increased pressure on time-to-market and need for innovation and renewed agility.
- 4.6 When a non-conformity and/or non-compliance occurs, ECC will follow the Navitas [Data Breach Management Framework](#), to ensure that all non-compliances are raised, reported and eventually escalated to relevant management.
- 4.7 ECC will inform Staff about those non-compliances that are expected to be escalated, under what circumstances, and to whom.

### Governance

- 4.8 ECC views good governance and management practice as essential to fulfilling its objectives in a responsible manner.
- 4.9 The Board of Directors will conduct its affairs legally, ethically and with transparency.
- 4.10 The Board will be responsible for ensuring that its composition is diverse and that its members have the necessary skill sets to ensure performance
- 4.11 The Board will adhere to principles of good governance to ensure that ECC:
- a) adheres to its purpose;

- b) engages in evidence-based, quality decision-making;
  - c) is accountable and transparent; and
  - d) addresses the needs of all Stakeholders.
- 4.12 The Board will maintain written agreements covering:
- a) the role of the Board;
  - b) the Board's structure, membership, tenure and appointment;
  - c) the role of Edith Cowan University and Navitas Pty Ltd in the governance and operation of ECC;
  - d) responsibilities of Board office holders;
  - e) Third Party agreements; and
  - f) the role of the College Director and Principal as the Principal Executive Officer of Edith Cowan College.
- 4.13 All ECC Staff will be:
- a) Invited to contribute annually to ECC's Mission Statement.
  - b) made aware of the Navitas Values;
  - c) provided with an induction that covers ECC, their role in the College and the Quality, Risk and Compliance Framework; and
  - d) informed of expectations of Staff outlined in the [Staff Code of Conduct](#).
- 4.14 ECC will maintain:
- a Governance Structure that:
    - a) identifies the governance bodies in the College and the reporting relationship between them;
    - b) provides terms of reference and membership of all governance bodies;
    - c) identifies delegations of authority;
    - d) outlines record-keeping and reporting mechanisms to be followed.
  - an organisation structure that:
    - e) identifies the roles and reporting relationships in the College; and
    - f) clarifies roles and responsibilities in the form of Job Descriptions.
  - a Policy Framework that:
    - g) provides Staff and Students with high-quality Policy documents that are easily accessed and readily understood;
    - h) contributes to an improved rate of Compliance with legislation and other mandated requirements;
    - i) enables ECC to achieve enhanced efficiency in its operations;
    - j) provides appropriate Quality Assurance and monitoring processes and ensure that the Policies are being developed, reviewed and updated appropriately on a rolling systematised cycle; and

- k) ensures Policy documents reflect governance and Policy development best practice in higher education and the broader Australian public sector; and
  - and a written record of:
    - l) strategic and operational plans for the business; and
    - m) decisions made and information reported.
- 4.15 ECC will prioritise feedback from Stakeholders, particularly Students, in its analysis, decision-making and planning for improvements.

### Risk Management

- 4.16 ECC will maintain a Board of Directors-approved Risk management strategy that:
- a) Aligns with ECC's business strategy;
  - b) Evolves with ECC;
  - c) distinguishes between different Risk categories;
  - d) outlines the structures and processes required to oversee Risk management activities;
  - e) is communicated through a clear and robust reporting structure; and
  - f) allows for escalation and reporting of Risks depending on the identified Risk rating.
- 4.17 The Board of Directors will ensure that ECC supports its Risk Management strategy with an appropriate organisational structure.

### Quality Assurance

- 4.18 Quality assurance at the College will be developed and supported through policies, principles, attitudes, actions and procedures that assure quality through a continuous improvement philosophy.
- 4.19 The aims of Quality Assurance are to:
- a) give internal and external stakeholders confidence in the management of operations, management, governance and outcomes; and
  - b) ensure the College meets both the expectations and performance measures in the higher education sector and national and transnational quality assurance standards.
- 4.18 ECC's Quality, Risk and Compliance Framework is designed around the four-stage Plan-Do-Check-Act (PDCA) cycle (see Figure 2),
- a) **Plan:** Identify the problems;
  - b) **Do:** Find potential solutions;
  - c) **Check:** Study results; and
  - d) **Act:** Implement the solution.
- 4.19 Beginning with strategic planning, this cycle of continuous improvement is overseen by Governance bodies and entails:

- a) establishing performance expectations at the level of the College and various work areas;
  - b) implementing mechanisms to achieve performance expectations;
  - c) monitoring performance results; and
  - d) adjusting or maintaining mechanisms as appropriate.
- 4.20 Quality Assurance at ECC will be informed by the following principles:
- a) **Quality Responsibility.** Quality is accepted as the responsibility of all staff
  - b) **Quality Staff and Resources.** Staff are trained, supported and resourced appropriately in order to deliver services and products consistent with ECC requirements.
  - c) **Quality Data and Information.** Processes are in place to ensure the consistent collection and analysis of data and information.
  - d) **Quality Practice.** Consistent and effective practices will be identified and communicated to the College community through Policy, Procedures, Guidelines and Forms.
  - e) **Quality Improvement.** Critical, honest and timely self-review and evaluation linked with reflection. Planned internal and external review promotes the constant evolution of practices and processes to ensure their ongoing suitability and adequacy.
- 4.21 ECC will implement an internal audit and review schedule that takes into account the external environment, Risk assessments, internal process and organizational changes.
- 4.22 The information collected, analysed and evaluated and included in Compliance reports, is used as the basis to identify opportunities for improvement in the *Quality Risk and Compliance Framework* and overall level of Compliance performance across the College and its Partner Providers.

### Grievance Resolution

- 4.23 In recognition that a robust Quality, Risk and Compliance system necessitates an effective system for resolving grievances, ECC will:
- a) in relation to Student concerns, adhere to the [Student Complaints Policy](#), [Student Appeals Policy](#) and provisions for Academic Review in Academic Policies.
  - b) in relation to Staff concerns, adhere to Navitas' [Grievance Management Policy](#) and the Navitas [Whistle-blowing Policy](#), which enables employees and/or others to report suspected or actual misconduct or violations of ECC's Compliance obligations on a confidential basis and without fear of retaliation.

### 5. ACCOUNTABILITIES AND RESPONSIBILITIES

- 5.1 The ECC Board of Directors is responsible for:
- deciding the nature and extent of the risks it is prepared to take to meet the Board's strategic objectives.
  - satisfying itself that significant risks are being managed appropriately within these parameters and that the system of risk management adopted is robust yet flexible enough to respond to changes in ECC's business environment;
  - ensuring the College Director and Principal designs and implements a Risk management and internal control system to effectively manage risks in order to achieve strategic objectives and operational priorities.
- 5.2 The College Director and Principal is responsible for:
- the content of this Policy and its operation within ECC;
  - ensuring that a Quality, Risk and Compliance culture is embedded across the College;
  - signing an annual compliance certification advising whether they are aware of any current or impending material issues of non-Compliance with a Compliance obligation.
- 5.3 ECC Directors and Managers are responsible for:
- In relation to Risk management
- ensuring that all Risks relating to the achievement of key strategic and business objectives have been identified and are being managed; and
  - where appropriate, corrective actions are in place;
- in relation to Compliance
- implementing relevant Policies, objectives and processes to achieve Compliance with obligations within their areas of responsibility, and
  - reporting any material issues of non-compliance with a compliance obligation to the College Director and Principal as soon as a reasonable suspicion of a potential breach has been formed;
- in relation to Quality Assurance:
- designing, implementing and monitoring quality processes and internal audits for work areas; and
  - supporting other staff when conducting quality assurance activities in their work area;
- 5.4 The Quality and Compliance Manager is responsible for:
- monitor and report to the College Director and Principal ECC's compliance with the *Higher Education Standards Framework (Threshold Standards) 2021* and other legislation relevant to the higher education sector;
  - ensure that ECC provides reasonable access to all areas, records and staff as required by the Registering bodies;
  - prepare non-financial submissions for the Registration of ECC as an Institute of

Higher Education and Accreditation of ECC courses

- 5.5 All Staff have a responsibility to recognise the responsibility for Compliance, Risk management and Quality Assurance that is inherent in the functions and operational activities that take place on a day-to-day basis in the College.

### 6. RELATED DOCUMENTS:

- 6.1 This Policy has been developed in line with requirements set out in the:

*Education Services for Overseas Students (ESOS) Act 2000 ;  
[National Code of Practice for Providers of Education and Training to Overseas Students](#)  
[Higher Education Standards Framework \(HESF\)](#)  
ECU-Navitas-ECC IP Licence and Services Agreement*

- 6.2 This Policy has been written to complement Navitas Policies related to Compliance, Risk and Quality Assurance, including:

*[Business Continuity Policy UPA](#)  
[Group Risk Management Policy](#)  
[Risk and Compliance Management Policy UPA](#)  
[Information Security Policy](#)  
[IT Acceptable Use Policy](#)  
[Privacy by Design Project Policy](#)  
[National Police Checks and Working with Children Checks Policy \(Australia\)](#)  
[Selection and Appointment of External Auditors Policy](#)*

### 7. CONTACT INFORMATION:

For queries relating to this document please contact:

<b>POLICY OWNER</b>	College Director and Principal
<b>ALL ENQUIRIES CONTACT:</b>	Quality and Compliance Manager
<b>TELEPHONE:</b>	08 6279 1133
<b>EMAIL ADDRESS:</b>	justask@ecc.edu.au

### 8. APPROVAL HISTORY:

<b>POLICY APPROVED BY:</b>	Senior Management Group
<b>DATE POLICY FIRST APPROVED:</b>	October 2022
<b>DATE LAST MODIFIED:</b>	
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<b>NEXT REVISION DUE:</b>	October 2024