

Governance, Risk & Compliance Policy

(Including Fit & Proper Person Requirements)

1. Purpose

The purpose of this policy is to ensure that Contempo College operates with effective governance, robust risk management, and ongoing regulatory compliance to deliver high-quality education and training outcomes while meeting all obligations under:

- The **Standards for Registered Training Organisations (RTOs) 2025**
- The **Education Services for Overseas Students (ESOS) Act and Regulations**
- The **National Code of Practice for Providers of Education and Training to Overseas Students 2018**

This policy establishes clear accountability, ethical leadership, provider integrity, and a culture of continuous improvement.

2. Legislative and Regulatory Framework

This policy is informed by and complies with, but is not limited to:

- Standards for Registered Training Organisations (RTOs) 2025
- Education Services for Overseas Students (ESOS) Act 2000
- Education Services for Overseas Students (ESOS) Regulations 2019
- National Code of Practice 2018
- Australian Qualifications Framework (AQF)
- Australian Consumer Law
- Relevant Commonwealth, State and Territory legislation

3. Scope

This policy applies to:

- The **Principal Executive Officer (PEO)**
- The **Campus Manager**
- Senior staff, trainers, assessors, and contractors
- Third-party arrangements delivering services on behalf of Contempo College

4. Governance Framework

4.1 Governance Commitment

Contempo College is committed to maintaining effective governance that ensures:

- Clear lines of accountability and authority
- Ethical and transparent decision-making
- Adequate resourcing to meet regulatory obligations
- Protection of learner interests and welfare, including overseas students

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4.2 Roles and Responsibilities

Principal Executive Officer (PEO):

- Holds ultimate accountability for compliance with all regulatory requirements
- Ensures the RTO operates lawfully, ethically, and in accordance with approved scope
- Oversees governance effectiveness, risk management, and compliance outcomes

Campus Manager:

- Implements governance frameworks at the operational level
- Monitors day-to-day compliance with RTO and ESOS requirements
- Reports risks, breaches, and non-compliances to the PEO

Staff and Contractors:

- Comply with all policies, procedures, and lawful directions
- Report risks, incidents, or compliance concerns promptly

5. Risk Management

5.1 Risk Identification and Assessment

Contempo College identifies and manages risks that may impact:

- Regulatory compliance
- Training and assessment quality
- Student outcomes and welfare
- Financial viability
- Reputational integrity

Risks are assessed based on **likelihood and impact** and recorded in a **Risk Register**.

5.2 Risk Controls and Monitoring

- Risk treatment strategies are assigned to responsible personnel
- Risk controls are monitored as part of:
 - Management meetings
 - Internal audits
 - Continuous improvement activities

High-risk areas include:

- Assessment integrity
- Overseas student compliance
- Third-party delivery
- Marketing and recruitment practices

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6. Compliance Management

6.1 Compliance Framework

Contempo College maintains a structured compliance management system that ensures:

- Ongoing awareness of regulatory obligations
- Regular monitoring against the RTO Standards 2025 and National Code 2018
- Prompt identification and rectification of non-compliance

6.2 Self-Assurance and Internal Review

Compliance is monitored through:

- Internal audits
- Validation and moderation outcomes
- Feedback, complaints, and appeals data
- Regulatory updates and guidance

Identified non-compliances result in:

- Root-cause analysis
- Corrective and preventive actions
- Recording in the Continuous Improvement Register

7. Fit and Proper Person & Provider Integrity

7.1 Provider Integrity

Contempo College ensures that all key personnel demonstrate integrity, competence, and suitability to operate an RTO and CRICOS provider.

7.2 Fit and Proper Obligations

The PEO and persons in positions of governance must:

- Act honestly, ethically, and responsibly
- Not engage in conduct that may adversely affect the provider's registration
- Disclose any relevant matters that may impact fit and proper status

The RTO monitors ongoing suitability through:

- Governance oversight
- Disclosure declarations where required
- Regulatory notifications as applicable

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8. Third-Party Oversight

Where third parties are engaged:

- Contempo College retains full responsibility for compliance and outcomes
- Due diligence is conducted prior to engagement
- Ongoing monitoring ensures services meet regulatory requirements

9. Records and Evidence

Records demonstrating compliance with this policy include:

- Governance meeting records
- Risk registers and risk treatment plans
- Internal audit reports
- Continuous improvement records
- Compliance monitoring evidence

All records are maintained in accordance with the Document and Records Management Policy.

10. Monitoring, Review and Continuous Improvement

This policy is:

- Reviewed biannually
- Reviewed following regulatory changes
- Updated in response to audit outcomes, incidents, or increased risk

Continuous improvement actions are tracked, implemented, and reviewed for effectiveness.

11. Related Policies and Documents

- Continuous Improvement Policy
- Training & Assessment Framework Policy
- Third-Party Management Policy
- Document & Records Management Policy
- Complaints & Appeals Policy

12. Status

This policy forms part of Contempo College's Quality Management System and supports compliance with the Standards for RTOs 2025 and the National Code 2018.

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