



COMPLIANCE POLICY

1. PREFACE

To ensure prudent administration, risk management and governance Police Health maintains a register of Board of Director approved policies.

The Board of Directors, where appropriate, has approved policies to delegate their authority or provide guidance to appropriate employees.

These policies are reviewed regularly, but not later than the review date specified in this policy. .

2. DEFINITIONS

Board of Directors (Board or BOD) means those persons appointed as Directors of Police Health Limited when meeting formally in relation to its Corporate Governance responsibilities.

Chairperson and Deputy Chairperson means those Directors respectively elected as the chair of the meetings of Directors or elected as deputy chair to chair meetings of Directors in accordance with clause 25.4 of the Constitution of Police Health Limited.

Compliance is the corporate obligation to comply with statutory requirements of Police Health and the establishment of systems and processes by which Directors and the Chief Executive Officer discharge their accountability in respect of the functions they are undertaking.

Director means a Director of Police Health Limited but does not, except to such extent as may be required by the *Corporations Act 2001*, include a person defined in Section 9 of the *Corporations Act 2001*, who is not a person appointed as and holding the office of, a Director in accordance with the Constitution of Police Health Limited.

Chief Executive Officer (CEO) means the person appointed by the Board of Directors to give effect to the Board's decisions. Where there is a Managing Director, reference to the CEO is also reference to the person who is the Managing Director.

Leadership Team (LT) means the CEO plus the Senior Managers.

Senior Manager (SM) means any person reporting directly to the CEO, whether permanently or temporarily employed, but not including contract or consultant service providers.

3. INTRODUCTION

Police Health operates in the private health insurance industry. Police Health is a restricted access insurer that operates a not for profit health fund under the *Private Health Insurance Act 2007*, and is a public company limited by guarantee under the *Corporations Act 2001*.

The Board is committed to developing a strong compliance culture within Police Health.

This policy articulates Police Health's commitment to compliance.

4. POLICY

Police Health is committed to compliance at all levels within the organisation.

Our Compliance Policy comes from the Board of Directors and the Chief Executive Officer. Our management and personnel take further responsibility for the promotion, understanding and compliance with laws, regulations, codes and organisational standards.

We aim to be and maintain the status of a good corporate citizen at all times.

We aim to prevent, and where necessary, identify and respond to breaches of laws, regulations, codes or standards occurring in Police Health.

The law enforcement industry values compliance and the associated integrity it implies.

Police Health, through its compliance program and the support of its personnel, aims to meet the requirements of the:

- *Private Health Insurance Act 2007*;
- *Competition and Consumer Act 2010*;
- *Privacy Act 1988*;
- *Corporations Act 2001*;
- Laws in relation to occupational health and safety, equal employment, harassment, bullying and governance; and
- Any other legislative requirement affecting Police Health.

A number of compliance issues that are of particular interest to Police Health are provided as an attachment to this policy.

We have a code of conduct for Directors and have established a set of values requiring our personnel to observe the highest standards of integrity in their conduct. We also have a commitment to the Private Health Insurance Code of Conduct.

We promote a positive attitude to compliance and are committed to the development and implementation of process and procedures that make compliance easier to understand and achieve. This will be done consistent with Australian Standards AS 3806-2006.

We adopt a policy of continuous improvement based on our training program and monitoring and review processes which are designed to identify and rectify any aspects of our compliance which can be improved.

While all personnel have a responsibility for compliance, the process is managed under the oversight of the Risk Management and Compliance Committee.

All personnel are encouraged to report compliance breaches and compliance risks to their line manager or any member of the Leadership Team. Escalation of a breach or risk is dependent upon the issue involved, but all breaches and risks must be brought to the attention of the Corporate Development Manager for recording and assessment through the Risk Management and Compliance Committee.

Non-compliance with legislation, regulation, common law or voluntary code may have extensive consequences on Police Health both financial and in reputation. The reputation of Police Health is particularly important given the community it serves. Breaches of compliance will be dealt with through the Police Health disciplinary procedures.

5. POLICY ADMINISTRATION

The policy should be regularly reviewed, but no later than the policy review date.

Date policy approved:	22 June 2011
Policy review date:	30 June 2012

References

Compliance Framework