



Service Standard 1.5.7

Compliance Management

Version	1.0
SOPs	Nil
Policy Owner	Director Office of the General Counsel
Policy Contact	Supervisor Assurance
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Next Review	2 December 2030

1. Purpose

- 1.1. The RFS has a wide range of mandatory and voluntary compliance obligations that arise from a variety of sources, including New South Wales and Commonwealth legislation, whole-of-government policies, RFS policy documents and operational doctrine, contractual agreements, case law and industrial instruments.
- 1.2. Failure to meet its compliance obligations can expose the RFS to a range of compliance risks, including an inability to implement its strategies, loss of public confidence and, in certain circumstances, potential criminal prosecution.
- 1.3. To have confidence that the RFS is meeting its legal obligations and policy commitments, the Commissioner must have assurance that the RFS has effective controls in place.
- 1.4. This policy establishes a compliance management system that will provide the Commissioner such assurance, as well as support senior executive decision making by ensuring they are aware of the RFS key compliance obligations and the status of the controls in place to ensure they are met.

2. Policy

- 2.1. The RFS is committed to complying with its legal requirements as well as its internal policies and procedures. To this end, the RFS will maintain and continuously improve a compliance management system in conformance with AS ISO 37301:2023 Compliance management systems that enables it to:
 - Identify new and changed compliance obligations
 - Maintain documented libraries of those obligations and their controls
 - Monitor and measure compliance performance.
- 2.2. Failure to comply with the RFS's compliance obligations may be considered a breach of Service Standard 1.1.17 Code of Conduct and Ethics, which requires all members to comply with state and federal laws as well as RFS service standards, policies, procedures and guidelines.

2.3. The RFS compliance management system will be based on The Institute of Internal Auditors' Three Lines Model:

Line 1: Managers

- Managers (including Directors and Deputy Commissioners) are responsible and accountable for meeting the RFS compliance obligations and providing assurance to the Commissioner that they are being met.

Line 2: Assurance team (compliance function)

- The compliance function, with the support of the legal function, is responsible for maintaining a compliance management system that supports Line 1 activities, identifying compliance obligations, assessing compliance risk, and reviewing controls and attestation statements.

Line 3: Assurance team (internal audit function)

- Line 1 and Line 2 compliance management activities are to be informed by internal audit findings as to the effectiveness of the RFS controls.

Risk-based approach

2.4. The RFS will analyse its compliance obligations to ensure that appropriate controls and assurance measures are in place for each of them.

2.5. Key compliance obligations, as determined by the Director Office of the General Counsel based on consultation with senior executives, will be recorded in the ServiceNow Policy and Compliance Management platform, and each will be:

- **Analysed** to determine an inherent risk rating in accordance with P7.1.10 Enterprise Risk Management, and
- **Mapped** to any relevant controls in place.

2.6. Those individual controls will be:

- **Assigned** to one or more appropriate owners, typically at the manager or director level, and
- **Attested to** by their owners to affirm that they have been implemented and are operating as intended.

2.7. Where inherent risk has been assessed as **Medium or above**, attestations must document how those controls provide assurance that the obligation is being met.

2.8. Where inherent risk has been assessed as **High or above**, that documentation must also reflect a design that enables monitoring to ensure that those controls are operating as intended.

2.9. The record of these obligations, controls and attestations stored in the RFS's electronic Governance, Risk and Compliance platform to be used as the basis of compliance reporting.

2.10. Key compliance obligations will be regularly reviewed, commensurate to their inherent risk and control effectiveness ratings, to ensure that the RFS has an accurate view of the extent to which it is meeting them.

2.11. Inherent Consequence ratings will be based on the realistic worst-case scenario legal/regulatory/compliance or reputational impact of noncompliance. To ensure consistency, inherent Likelihood will be rated as 'Possible' absent compelling evidence supporting a different rating.

2.12. This information will be made available to the RFS Risk Stewards as well as the Risk and Policy team to inform the management of the agency's enterprise risks.

Roles and responsibilities

2.13. The Commissioner and Deputy Commissioners are responsible for:

- Communicating the importance of effective compliance management to RFS members
- Ensuring that the RFS compliance policy aligns with its strategic direction
- Ensuring that the RFS compliance function is sufficiently resourced and supported to effectively operate the compliance management system
- Ensuring that the RFS implements appropriate controls to manage its compliance risks and that, as appropriate, periodic training and assessment are in place to ensure staff possess the necessary knowledge, skills and understanding to fulfil their compliance obligations.

2.14. All staff are responsible for:

- Adhering to the RFS compliance obligations, including this policy
- Reporting compliance concerns, issues and failures to their manager or via the [Probitry Declaration Form](#)
- Participating in compliance training as directed.

2.15. All managers of RFS staff (including Directors and Deputy Commissioners) are responsible for:

- Cooperating with and supporting the compliance function and encouraging their staff to do the same
- Ensuring that their staff are complying with the RFS compliance obligations, including this policy
- Developing their staff members' awareness of their compliance obligations and directing them to meet any training and competence requirements
- Encouraging their staff to raise compliance concerns, supporting them in doing so and precluding any form of retaliation
- Reporting significant instances of noncompliance via the [Probitry Declaration Form](#)
- Actively participating in the management and resolution of compliance-related incidents and issues within their control.

2.16. The Director Office of the General Counsel is responsible for:

- Managing the compliance function (Assurance team) and providing independent oversight of the operation of the compliance management system
- Conducting regular reviews to identify changes in applicable legislation, updating the RFS library of compliance obligations accordingly and communicating significant updates to relevant stakeholders
- Assessing and documenting the RFS's compliance risks
- Monitoring whether controls have been implemented to meet the RFS's compliance obligations in line with the requirements of this policy
- Advising managers on compliance-related matters, including where policies, processes or procedures do not adequately address relevant compliance obligations
- Providing resources and training on RFS compliance management policies, processes, procedures and systems to ensure staff can use the compliance management system
- Reviewing compliance concerns, including those submitted via the [Probitry Declaration Form](#)

- Identifying, documenting and reporting on significant instances of noncompliance and the status and outcomes of any corrective actions to address them to the senior executives and the Audit & Risk Committee
- Monitoring and measuring the RFS's compliance performance and providing regular reporting to the senior executives and Audit & Risk Committee
- At least annually, analysing and evaluating the performance of the compliance management system to identify and address improvement opportunities aligned with AS ISO 37301:2023 Compliance management systems.

3. Definitions

3.1. For the purpose of this policy document the following definitions apply:

- Compliance management system:** a framework that integrates essential structures, policies, processes and procedures to achieve the desired compliance outcomes, and act to prevent, detect and respond to noncompliance
- Compliance obligations:** mandatory requirements with which the RFS must comply, as well as those that the RFS voluntarily chooses to comply with
- Compliance risk:** the likelihood of occurrence and consequences of noncompliance with the organisation's compliance obligations
- Control:** a method for ensuring that a compliance obligation is met or that noncompliance is prevented, detected and corrected; examples include:
 - clear, practical and easy-to-follow documented operating policies, processes, procedures and work instructions
 - systems and exception reports
 - approvals
 - the segregation of incompatible roles and responsibilities
 - automated processes
 - annual compliance plans
 - personnel performance plans
 - compliance assessments and audits
 - demonstrated management commitment and exemplary behaviour, and other measures to promote compliant behaviour
 - active, open and frequent communication on the expected behaviour of employees (standards and values, codes of conduct).
- Effectiveness:** the extent to which planned activities are realised and planned results are achieved
- Noncompliance:** non-fulfilment of the RFS compliance obligations.

4. Document control

Release history

Version	Date	Summary of changes
1.0	2 December 2025	Initial release

Approved by

Name	Position	Date
Trent Curtin	Commissioner	2 December 2025

Related documents

Document name
Probity Declaration Form
AS ISO 37301:2023 Compliance management systems
Guide for Audit and Risk Committees: Compliance Management Systems
Policy P7.1.10 Enterprise Risk Management
Service Standard 1.1.7 Code of Conduct and Ethics
RFS Internal Audit Charter
The Institute of Internal Auditors' Three Lines Model