

# Policy: Fraud and corruption control

## Purpose

To outline the University's approach to controlling fraud and corruption in and against the University.

## Overview

The University is required under section 10 of the Public Governance, Performance and Accountability Rule 2014 made under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) to take all reasonable measures to prevent, detect and deal with fraud, including by conducting fraud risk assessments, developing and implementing a fraud control plan, and having appropriate mechanisms for preventing, detecting, investigating, recording and reporting incidents of fraud and suspected fraud.

This policy sets out the principles behind the University's approach to fraud and corruption. It has been developed having regard to the Commonwealth Fraud Control Framework, including *Resource Management Guide No. 201: Preventing, detecting and dealing with fraud*, issued by the Minister for Justice in 2017.

## Scope

This policy applies across the University.

## Definitions

**Corruption** is abuse of a position of trust in order to achieve personal gain for oneself or another person, and includes bribery, receiving or soliciting secret commissions, collusive tendering, and serious conflicts of interest.

**Fraud** is defined in the Commonwealth Fraud Control Framework to mean dishonestly obtaining a benefit, or causing a loss, by deception or other means. Benefits may be financial, such as misappropriating property and false invoicing, or non-financial, such as falsification of research results and disclosure of information for a dishonest purpose. Intent to defraud is necessary for an offence to have been committed. Offences include the fraudulent conduct offences that apply to Commonwealth entities under Chapter 7 of the Criminal Code 1995.

**PGPA Act** is the *Public Governance, Performance and Accountability Act 2013*.

**Staff** means staff members and individuals who enter into particular relationships with the University for a specified time period, including Council and committee members, contractors, visiting fellows, adjunct appointees, visitors and volunteers.

## Policy statement

### Principles

1. The University has zero tolerance for fraud and corruption. Accordingly, the University is committed to minimising the incidence of fraud and corruption through the identification of fraud risks and the development, implementation and regular review of a range of fraud prevention and detection strategies, and fraud control processes, in accordance with the PGPA Act and Rules made under that Act.
2. The University will seek prosecution of those who commit fraud against it, whether they are within or external to the University, and will cooperate with fraud and corruption investigations by law enforcement and other investigative authorities.
3. The University will seek to reclaim any money or other resources misappropriated through fraudulent or corrupt activity and will take appropriate disciplinary action against staff members found to have engaged in such activity.
4. The University Executive will foster an environment that makes active fraud and corruption control the responsibility of all staff.
5. The University encourages the reporting of suspected fraud and corruption, either through reporting to supervisors and line managers, by direct report to the Director, Corporate Governance and Risk Office, or in accordance with [the University's Public Interest Disclosure Policy](#) and [Procedure \(PID\)](#). The University will take active steps to support and protect anyone who makes a disclosure either under PID or reports suspected fraud and corruption through normal lines of reporting to management, provided the disclosure is made in good faith.
6. Information relating to suspected fraud or corruption will be collected and handled appropriately having regard to the principles of confidentiality and natural justice and the requirements for reporting to law enforcement authorities.

## Document information

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