

# Policy: Fraud and corruption control

## Purpose

The objectives of this policy are to:

- provide guidance concerning behaviour that constitutes fraud and corruption
- outline the responsibilities of staff, including the behaviour expected in relation to any suspicion or detection of fraud or corrupt conduct; and
- provide guidance about the avenues available to report current or past instances of fraud or corrupt conduct.

## 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 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* in 2017.

## Scope

This policy applies to all staff, students, Visiting and Honorary Appointments (VaHA), volunteers, affiliates, contractors, controlled entities, and persons authorised to undertake University related business.

Matters relating to falsification of research results or research misconduct is managed separately under the [Research Misconduct and Serious Research Misconduct procedure](#).

## 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 non-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 activities stipulated in the [Fraud Control Framework](#), in accordance with the PGPA Act and Rules made under that Act.
2. The University Executive will foster an environment that makes active fraud and corruption control the responsibility of all staff.
3. University staff and students must:
  - a. understand the policy and undertake relevant training to aid comprehension and compliance with this policy;
  - b. comply with University legislation, policies and terms and conditions of employment in the performance of their work;
  - c. act honestly and exercise skill, care and diligence in the performance of their duties;
  - d. not intentionally cause unacceptable risk to the reputation or financial viability of the University;
  - e. observe the highest standards of integrity in financial matters and supporting processes;
  - f. disclose to their supervisor, all actual, potential or perceived conflict of interest; and
  - g. report any suspected fraud or corruption as outlined in this policy and procedure.

4. 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.
5. 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.
6. 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.
7. 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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