Fraud and Corruption Control Plan

Section 1 - Purpose

(1) The purpose of the Fraud and Corruption Control Plan (Plan) is to provide the University of Canberra (University) with a formal plan for the ongoing management of its fraud and corruption risks.

(2) This Plan forms a critical part of the University's broader Resilience Management Framework and is consistent with the Australian Standard 8001-2021 Fraud and Corruption Control.

(3) The Public Interest Disclosure Act 2012 applies to the University as an ACT Public Sector entity and the measures to prevent, detect and deal with fraud found in the Public Interest Disclosure Act 2012 are set out in this Plan.

(4) The University does not tolerate fraudulent conduct which includes any form of corrupt conduct. 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.

(5) The University will seek prosecution of those who commit fraud against it, whether they are internal or external to the University, and the recovery of any money or resources misappropriated through fraudulent or corrupt activity.

(6) The University will take appropriate disciplinary action against staff members who have engaged in fraudulent or corrupt activity and all University staff are encouraged to become familiar with this Plan and contribute to its effective implementation.

Section 2 - Procedure

Student Fraud and Grievance Processes

(7) The University of Canberra (Student Conduct) Rules 2023 set out procedures for reporting and dealing with cases of alleged misconduct by a student, whether academic or non-academic, the consequences which flow from findings of misconduct, and appeal rights for students.

Approach to Fraud Risk Management

(8) To manage its fraud risk, the University has developed:

a. key policies to support an effective control environment which will discourage fraud, facilitate its detection and ensure timely reporting of potential fraud and its investigation
b. a Fraud Risk Register for the University (in accordance with the University's Risk Management Plan) in order to identify key fraud risk exposures across the University, together with controls to manage those risks
c. mechanisms for preventing, detecting and responding to fraud – refer to Fraud and Corruption Control Plan - Appendix A for an outline of these measures, and
d. mechanisms for investigating or otherwise dealing with incidents of fraud or suspected fraud – refer to Fraud and Corruption Control Plan - Appendix B for details.

This policy document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. It is the responsibility of staff printing this document to always refer to the Policy Library for the latest version.

Section 3 - Roles and Responsibilities

(9) Effective fraud control requires active participation and input from all University personnel. This Plan is one element of the University's effective fraud control strategy. It is essential that fraud control be consistently integrated into the management and culture of the University.

(10) Management and staff should familiarise themselves with the areas of specific responsibility as set out in the table below. Prior awareness will assist in a prompt and effective response to fraud, should it be suspected. This will assist in reducing the chances of fraudulent activity succeeding, enhancing the potential for successful investigation and assisting in the mitigation of losses and damage to reputation.

Who	Responsibilities
Council	• Primary responsibility for fraud control as the governing authority of the University under the University of Canberra Act 1989.
Audit and Risk Management Committee	• Review, evaluate, approve and monitor, on the delegated authority of Council, fraud policy and systems. • Advise Council on the adequacy and effectiveness of the University's control environment, including major risks which may impact on the operation or reputation of the University and associated risk mitigation mechanisms.
Vice-Chancellor (Public Interest Disclosure Officer)	• Approves the Fraud and Corruption Control Plan. • Foster an environment within the University which makes active fraud control and ethical behaviour a responsibility of all staff and ensure strategies are implemented to prevent, detect and investigate fraud. • Hold the position of Public Interest Disclosure Officer under the Public Interest Disclosure Act 2012, with particular responsibilities for receiving and acting upon disclosures of suspected instances of fraud or corruption. • Make a final decision following any investigation into fraudulent or corrupt behaviour, and in response to the disclosure based on the recommendations of the investigation, including potential prosecution.
Chief Operating Officer and Vice-President Operations (Public Interest Disclosure Officer)	• Establish and maintain procedures for the University to facilitate and deal with public interest disclosures, including, but not limited to, instances of actual or suspected fraud and corruption. • Hold the position of Public Interest Disclosure Officer under the Public Interest Disclosure Act 2012, with particular responsibilities for receiving and acting upon disclosures of suspected instances of fraud or corruption. • Ensure reviews of the University's Fraud and Corruption Control Plan and supporting Fraud Risk Register are undertaken in accordance with the University's Resilience Management Framework. • Receive fraud allegations, conduct an initial assessment, and where substantiated refer the allegation for formal investigation as per the procedures in the Fraud and Corruption Control Plan - Appendix B. • For each detected occurrence of fraud, ensure a review is undertaken to assess the adequacy of the University's internal control structure. • Ensure University staff clearly understand their obligations and receive fraud awareness training.
People & Culture	• Custodian of the Charter of Conduct and Values, which is enforceable and outlines the University's expectations of its employees. • Ensure cases of fraud or potential fraud are handled in accordance with Schedule 6 - Handling Misconduct Procedure and/or Clause 42 Handling Serious Misconduct of the Enterprise Agreement. • In cases of serious misconduct, convene an independent panel of review and provide relevant information to the Vice-Chancellor to enable a determination as to whether employment will or will not be terminated. • In cases of professional staff misconduct, appoint an independent delegate to conduct an investigation.

Who	Responsibilities
Director, Risk and Audit	• Facilitate reporting of actual or suspected instances of fraud or corruption. If an incident of fraud or corruption is reported to the Director, Risk and Audit he/she will notify a Public Interest Disclosure Officer for the purpose of complying with the Public Interest Disclosure Act 2012. • Coordinate fraud control management to ensure that the University's Fraud and Corruption Control Plan and supporting Fraud Risk Register are reviewed in accordance with the University's Resilience Management Framework. • Coordinate fraud risk assessment by: ◦ review of the implementation of additional controls/strategies identified in this Plan and the Fraud Risk Register, and ◦ reporting to the Audit and Risk Management Committee twice each year. • Establish and maintain the Fraud Risk Register. • Ensure all updates and changes to University's fraud and corruption related rules, policies, procedures, codes of conduct, and guidelines on behaviour are communicated to all staff.
Internal Audit team	• Undertake key management-initiated reviews. • Prepare strategic and internal audit plans. • Conduct internal audit reviews. • Report any suspected incidents of fraud or corruption.
Executive Deans/Directors/ Managers	• Implement fraud control strategies as identified in the Fraud Risk Registers and this Plan. • Ensure staff clearly understand their role and obligations as a first line of defence in the prevention and detection of fraud. • Ensure that their staff are aware of the mechanisms for reporting incidents of suspected fraud and encourage staff to report any suspected incidents of fraud to an appropriate contact officer in accordance with this Plan. • If an incident of fraud or corruption is reported to an Executive Dean, Director or Manager they should notify a Public Interest Disclosure Officer for the purpose of complying with the Public Interest Disclosure Act 2012.
Staff	• Behave with honesty and integrity, in accordance with applicable law, University Rules, policies, procedures and code of ethics and conduct. • Implement fraud risk management strategies and participate fully in activities relating to fraud control. • Report all incidences of suspected or actual fraud to an appropriate contact officer in accordance with this Plan. • Deal with all reports of fraud in a professional and prompt manner. • Undertake training in fraud awareness, ethics and privacy as required.

Section 4 - Implementation and Reporting

Fraud Disclosure Avenues

(11) Instances of actual or suspected cheating, plagiarism or other form of fraud by a student, should be reported to Deputy Vice-Chancellor or a Prescribed Authority (defined under the University of Canberra (Student Conduct) Rules 2023) to be dealt with in accordance with the Student Conduct Rules.

(12) Actual or suspected fraud by staff or contractors engaged by the University should be disclosed to one of the following disclosure officers:

a. Vice-Chancellor
   E-mail: ovc@canberra.edu.au
b. Chief Operating Officer and Vice-President Operations
   Eric Wells
   Ph: (02) 6206 8515
   E-mail:eric.wells@canberra.edu.au
   Mail: University of Canberra, Australia 2601
c. Alternatively, actual or suspected fraud by staff or contractors can be reported online through the Health and Safety Online Report Form (option to report anonymously).

(13) The suspected or actual fraud may be disclosed anonymously or in-confidence but should, wherever possible, be detailed and include information such as:

a. name of the relevant business unit, faculty, centre, activity, program, course or arrangement
b. name of parties involved
c. brief details of the actual or suspected fraud, and
d. any other information considered relevant.

(14) Instances of actual or suspected fraud may be dislosed to any University staff. However, the person making the notification should be aware that such instances will be reported to a Public Interest Disclosure Officer for the purposes of complying with the Public Interest Disclosure Act 2012.

(15) Managers and staff members are to be guided by the advice of the Vice-Chancellor or the Office of the Chief Operating Officer and Vice-President Operations and, following a report, are to refrain from any action which may potentially jeopardise the success of an investigation.

(16) A Public Interest Disclosure Officer must acknowledge receipt of any public interest disclosure involving actual or suspected fraud by issuing a formal acknowledgement letter to the person who has made the disclosure. The Public Interest Disclosure Officer will assess, manage and potentially investigate the notification/allegation in accordance with the processes set out in Fraud and Corruption Control Plan - Appendix B.

Section 5 - Definitions

Terms	Definitions
Fraud	The University defines fraud as 'dishonestly obtaining a benefit or causing a loss by deception or other means'. Fraud against the University may include, but is not limited to: • theft • accounting fraud • causing a loss, or avoiding and/or creating a liability • providing false or misleading information to the University, or failing to provide information when there is an obligation to do so • misuse of University assets, equipment or facilities • making, or using false, forged or falsified documents • bribery or corruption • wrongfully using University information or intellectual property. The benefit referred to are not restricted to monetary or material benefits, and may be tangible or intangible, including unauthorised provision of access to or disclosure of information. A benefit may also be obtained by a third party rather than, or in addition to, the perpetrator of the fraud. Fraud can be perpetrated by employees/contractors (internal fraud) or by external parties such as service providers, students or members of the public (external fraud).
Corruption	Is a form of fraud and the University has adopted the definition of corruption as provided in Australian Standard 8001-2021 Fraud and Corruption Control, being: 'abuse of a person's position or office for personal gain (e.g. bribery, misuse of information, nepotism, illegal conduct, maladministration, wastage of public money)'. Examples of corruption by University officers may include: • release of confidential information for an improper purpose in exchange for some form of financial or non-financial benefit • bribery of officials in order to secure a contract for the supply of goods or services • conflict of interest whereby an officer acts in his or her own self-interest rather than the interests of the entity to which he or she has been appointed.

Status and Details

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Custodian	Geoff Drummond Chief Financial Officer
Responsible Manager	Warwick Bennett Associate Director, Safety and Wellbeing
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