

Fraud and Corruption Control Plan

Section 1 – Purpose

- (1) The University of Canberra (University) has zero tolerance for any type of Fraud or Corruption.
- (2) This Fraud and Corruption Control Plan (Plan) has been developed to assist in preventing, detecting and responding to Fraud and Corruption. It seeks to:
 - a. promote a culture of accountability, honesty, integrity, and ethical conduct.
 - b. reinforce the University's commitment to, and responsibility for, minimising the opportunities for Fraud or Corruption occurring in, and against, the University.
 - c. ensure the University's assets, revenue, expenditure, facilities and reputation are safeguarded against loss or damage arising from Fraud or Corruption.
 - d. ensure that appropriate action is taken when suspected Fraud or Corruption is reported or detected, including the referral to an appropriate statutory authority or Law Enforcement Agency.
- (3) This Plan forms a critical part of the University's broader *Resilience and Response Management Framework*, and operates in conjunction with the *Whistleblowing (and Public Interest Disclosure) Procedure*. The Plan principally aligns with the [AS 8001-2021 Fraud and Corruption Control](#).
- (4) The University will, wherever practical, align with best practice advice issued by organisations such as the ACT Integrity Commission, the ACT Ombudsman and the ACT Audit Office.
- (5) The University commits to formally reviewing this Plan at least every two years.

Section 2 – Scope

- (6) This Plan applies to the University community, which for the purposes of this Plan includes:
 - a. controlled entities of the University;
 - b. Staff (including Students employed by the University);
 - c. Students;
 - d. Affiliates;
 - e. individuals conducting research under the auspices of the University including but not limited to Staff, Affiliates, and Students;
 - f. visiting academics, and conjoint appointees;
 - g. members of the University Council and Council Committees;
 - h. Volunteers; and

- i. all persons otherwise engaged to provide a service to the University, including but not limited to business associates, partners, service providers, consultants, contractors and employees of contractors providing services to the University.
- (7) The University community are encouraged to become familiar with this Plan and contribute to its effective implementation.
- (8) In addition, and separate, to the obligation sets out under this Plan, members of the University community exercising a function of the University are considered 'public officials' under the [Integrity Commission Act 2018 \(ACT\)](#) and are subject to the jurisdiction of the ACT Integrity Commission.

Relationship with other University processes and procedures

- (9) This Plan should be read in conjunction with existing University processes and procedures, as recorded in the following documents which may be amended from time to time:
- a. Academic Integrity Policy and Procedure;
 - b. Conflict of Interest Policy;
 - c. Charter of Conduct and Values;
 - d. Delegations of Authority Policy;
 - e. DITM and Records Management Policy Manual;
 - f. Enterprise Agreement;
 - g. Gifts and Fundraising Policy;
 - h. Intellectual Property Policy and Procedure;
 - i. Internal Audit Charter;
 - j. Modern Slavery Policy;
 - k. Procurement Policy and Procedure;
 - l. Property, Plant and Equipment (PPE) Assets Policy;
 - m. Research Conduct and Complaints Procedure;
 - n. Risk Management Plan;
 - o. Student Conduct Rules;
 - p. Travel Policy and Procedure; and
 - q. Whistleblowing (and Public Interest Disclosure) Procedure.

Section 3 – What is Fraud and Corruption?

Fraud

- (10) Fraud includes “dishonest activity causing actual or potential gain or loss to any person or organisation including theft of moneys or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediate following the activity” ([AS 8001- 2021 Fraud and Corruption Control](#)).

- (11) Fraud requires more than non-compliance, carelessness, accidents or error. The key element of Fraud is the presence of dishonesty.
- (12) Fraud can arise in many forms, including but not limited to:
- a. theft;
 - b. misuse of University's assets, equipment or facilities (including University information and intellectual property);
 - c. accounting fraud (for example false invoices, or the misappropriation of funds);
 - d. causing a loss or avoiding and/or creating a liability by deception;
 - e. providing false or misleading information or failing to provide information when there is an obligation to do so;
 - f. unrecorded leaves of absence from the workplace, or the falsification of time sheets; and
 - g. making, using or possessing forged or falsified documents.

Corruption

- (13) Corruption can be described in broad terms as “dishonest activity in which a person associated with an organisation (e.g. director, executive manager, employee or contractor) acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of, and in the interests of, the organisation, in order to secure some form of improper advantage for the organisation either directly or indirectly” ([AS 8001-2021 Fraud and Corruption Control](#)).
- (14) Corruption can involve both procuring a benefit for oneself or another or causing a detriment to another.
- (15) For the purposes of this Plan references to Corruption include:
- a. Bribery; and
 - b. Corrupt Conduct, Serious Corrupt Conduct and Systemic Corrupt Conduct as defined under the [Integrity Commission Act 2018 \(ACT\)](#).
- (16) Corruption can arise in many forms, and may include:
- a. collusion between a member of the University community and a contractor, consultant or third-party service provider;
 - b. manipulating a procurement process for personal gain;
 - c. receiving or soliciting secret commissions, kickbacks, or financial or non-financial benefits;
 - d. the release of confidential information for an improper purpose in exchange for some form of financial or non-financial benefit;
 - e. bribing officials to secure a contract for the supply of goods or services;
 - f. nepotism – providing preferential treatment, such as privileges, positions or advantages, to family members;

- g. cronyism – the act of favouritism towards friends and associates, such as privileges, positions or advantages, regardless of their qualifications, skills, experience or merit;
- h. failure to declare a conflict of interest; and
- i. inappropriate targeting and recruiting of Staff and/or Students to further a foreign actor’s interests.

(17) The University has a statutory obligation under the Integrity Commission Act 2018 (ACT) to report any suspected Corrupt Conduct, Serious Corrupt Conduct or Systemic Corrupt Conduct to the ACT Integrity Commission.

Identifying potential Fraud and Corruption at the University of Canberra

(18) Some examples of the different types of Fraud and Corruption which may occur either within, or against, the University are contained in Appendix A.

Section 4 – Preventing Fraud and Corruption

(19) As part of the University’s Fraud and Corruption prevention strategy, the University has developed several controls, systems and processes that it considers proportionate to the Fraud and Corruption risks it faces. Key elements of the University’s Fraud and Corruption prevention strategy include:

- a. **Fraud and Corruption risk assessments** – regular risk assessments, reviews and testing occurring at least every two years to ensure that controls remain responsive and effective. This includes updating the *Fraud and Corruption Risk Register* (in accordance with the University’s *Risk Management Plan*) to ensure it accurately captures both present and emerging Fraud and Corruption risk exposures and vulnerabilities across the University.
- b. Fraud and Corruption training and education for Staff.
- c. **Internal and External Audits** – both internal and external audits play a critical role in the prevention and detection of Fraud and Corruption
- d. **Conflict of Interest Register** – maintained in accordance with the University’s *Conflict of Interest (COI) Policy*.
- e. **Gift Acceptance and Administration Committee** – to provide oversight of proposed gifts to the University.
- f. **Pre-employment screening and employee declarations** – for example the *Employee Background Checks Policy and Procedure* and *Additional UC Employment Procedure*.
- g. Vetting of potential contractors, service providers, business associates and partners, including overseas education agents and intermediaries.
- h. Policies and Procedures - to support an effective control environment which will discourage Fraud and Corruption, facilitate its detection and ensure timely

reporting of potential Fraud and Corruption. Examples of these key Policies and Procedures are set out at clause (9) above.

- i. **Maintaining systems and physical controls** – for example IT access and access to University buildings and facilities.
- j. Governance, accountability and oversight processes by Executive and Council members of the University.

Section 5 – Detecting Fraud and Corruption

(20) The University acknowledges that Fraud and Corruption can occur in various ways, and that no system of preventative controls can provide an absolute assurance that Fraud and Corruption will not occur. It is critical that preventative measures are supplemented with controls to support early detection. This aims to reduce the University's exposure and vulnerability to Fraud and Corruption, and to promote a rapid and effective response in instances where conduct is suspected or detected.

(21) The University's approach to detection includes, but is not limited to:

- a. Internal and External Audits;
- b. processes for reporting Wrongdoing (including Fraud and Corruption) as outlined in the Whistleblowing (and Public Interest Disclosure) Procedure;
- c. data analysis (including analysis of accounting reports) to identify potential indicators, risks and trends with respect to the occurrence of Fraud and Corruption;
- d. post-transaction reviews to ensure transactions authorisations have been properly made, recorded and supported by appropriate supporting documentation;
- e. Staff and Student Misconduct processes; and
- f. information obtained through voluntary exit interviews.

Section 6 – Responding to Fraud and Corruption

Reporting Fraud and Corruption

(22) The University encourages the reporting of all Wrongdoing, including suspected Fraud and Corruption and Public Interest Disclosures. The process for making a report is set out in the University's Whistleblowing (and Public Interest Disclosure) Procedure.

Assessing suspected Fraud and Corruption

(23) All incidences of suspected Fraud or Corruption will be handled appropriately with consideration to the nature and seriousness of the allegation.

(24) Upon becoming aware of suspected Fraud or Corruption the University will:

- a. take any action it considers appropriate to minimise the risk of any harm or loss occurring as a result of the suspected conduct;
- b. obtain any advice it considers necessary in respect of the suspected conduct; and

- c. undertake a preliminary assessment of the suspected conduct.
- (25) In conducting the preliminary assessment, the University will determine whether to:
- a. further investigate the matter, including how the investigation should be carried out;
 - b. refer the matter to an external body; or
 - c. take no further action.

Investigations

- (26) An investigation into suspected Fraud and/or Corruption shall be undertaken by appointed persons either within or external to the University as determined by the University in its sole discretion.
- (27) Investigations into actual or suspected Fraud and/or Corruption shall be conducted by appropriately skilled and experienced investigators who are independent from the part of the University in which the alleged Fraud or Corruption occurred or is suspected to have occurred.
- (28) Investigations are to be conducted in accordance with principles of natural justice, independence, and objectivity and without unnecessary delay.
- (29) If an internal or external investigation indicates potential misconduct by:
- a. a Staff member, the matter will be referred to the Chief People Officer for further action.
 - b. a Student, the matter will be referred to an Authorised Person or a Prescribed Authority, as defined in the [University of Canberra \(Student Conduct\) Rules 2023](#), for further action.
- (30) The process for conducting an investigation into an allegation of academic misconduct by a Student is described in the [University of Canberra \(Student Conduct\) Rules 2023](#).
- (31) Investigations into allegations of misconduct by a Staff member are to be conducted in accordance with the procedures for investigating misconduct as set out in the *Enterprise Agreement*.
- (32) Investigations into actual or suspected research misconduct and academic integrity breaches are to be conducted with in accordance with the procedures set out in the *Research Conduct and Complaints Procedure*.
- (33) The University reserves the right to delay, suspend or terminate an investigation at any time, where it considers it appropriate to do so.

Referral to external bodies

- (34) The University takes its statutory reporting obligations seriously and will determine whether the suspected Fraud or Corruption is required to be reported to an appropriate external body, such as a Law Enforcement Agency, ACT Ombudsman or the ACT Audit Office.
- (35) Any matter that, on reasonable grounds, concerns or may concern a criminal offence will be reported to the relevant Law Enforcement Agency.

- (36) Reporting to an external body or Law Enforcement Agency must take place as soon as there are reasonable grounds to suspect that Fraud, Corruption, or a criminal offence has occurred or is about to occur. The University will cooperate and assist an external body or Law Enforcement Agency, as is lawfully requested.

Investigation Outcomes

- (1) Where a contractor, external consultant or outsourced service provider has engaged in Fraud or Corruption, the University will consider all contractual actions that may be available to it (including but not limited to contract renegotiation or termination). Other actions, such as closer contract management supervision and monitoring; or declining future engagements, may also be taken by the University.
- (2) When an investigation has identified a need for improved controls or processes, or opportunities for improvement, the University will review and update the relevant controls and/or processes as is appropriate.

Loss recovery

- (3) The University may, at its absolute discretion, take any action to recover any loss incurred through Fraud or Corruption.

Insurance

- (4) The University will maintain relevant insurance and liability protection coverage against losses emanating from Fraud or Corruption.
- (5) The University will conduct periodic reviews of its insurance and liability protection coverage in relation to its Fraud and Corruption risks, including consideration of the level of cover, inclusions, exclusions and deductibles.

Communications protocol

- (6) The Vice-Chancellor & President will determine the appropriate communications protocol to be adopted, including the nomination of an authorised spokesperson, in respect of any allegation or finding of Fraud or Corruption.

Section 7 – Roles and Responsibilities

- (37) The effective implementation of this Plan requires active participation and input from all members of the University community. It is essential that awareness as to the risks and impact of Fraud and Corruption are consistently integrated into both the management and culture of the University.
- (38) The University will ensure that Staff are provided with information and training in respect of preventing, detecting, and responding to Fraud and Corruption, and Staff are expected to participate in such training activities, as is required.
- (39) Members of Council, Staff and Students should familiarise themselves with their specific responsibilities in respect of this Plan as set out in the table below.

WHO	RESPONSIBILITIES
Academic Board	<ul style="list-style-type: none"> Monitors risks and trends in academic misconduct and advises Council on appropriate institutional strategies in response to those risks and trends.
All Staff and Students	<ul style="list-style-type: none"> Acts in accordance with the <i>Charter of Conduct and Values</i>, applicable laws, University Statutes, Rules, Policies, Procedures when undertaking duties and representing the University. Discloses any conflict of interests, gifts and fundraising activities in accordance with University Policies and Procedures. Actively participates in the implementation of Fraud and Corruption risk management strategies, and assist with activities designed to prevent, detect and respond to Fraud and Corruption. Reports, and encourages others to report, all information pertaining to any incidence of suspected Fraud or Corruption in accordance with the <i>Whistleblowing (and Public Interest Disclosure) Procedure</i>. Deals with all reports of suspected Fraud and Corruption in a professional and prompt manner. Assists any person who is appointed to investigate suspected Fraud or Corruption. Participates in any training related to preventing, detecting and responding to Fraud and Corruption as is required. Maintains appropriate record keeping.
Audit and Risk Management Committee (ARMC)	<ul style="list-style-type: none"> Responsible for the oversight of the University's internal assurance functions including Risk and Compliance, and Internal Audit. Reviews, evaluates, approves and monitors on the delegated authority of Council, systems relating to the <i>Fraud and Corruption Control Plan</i>. Advises 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. Receives regular reporting on Fraud and Corruption matters, including instances of suspected Fraud and Corruption, risks to the University, and preventative or remedial action taken.
Chief Financial Officer (CFO)	<ul style="list-style-type: none"> Establishes appropriate and effective financial systems, policies, procedures and controls to assess, and mitigate against, Fraud and Corruption risks. Provides assurance on the adequacy of the University's financial controls to the University's external auditors. Notifies banks, and other financial institutions, as is required. Provides training and education regarding the appropriate use of University corporate credit cards.

WHO	RESPONSIBILITIES
	<ul style="list-style-type: none"> Establishes appropriate and effective procurement systems, and controls to assess, and mitigate against, Fraud and Corruption risks.
Chief Information Officer (CIO)	<ul style="list-style-type: none"> Maintains up-to-date industry knowledge and understanding of technology enabled Fraud, Corruption and Cybercrime. Provides advice to the University on: <ul style="list-style-type: none"> current and emerging technology enabled Fraud, Corruption and Cybercrime risks and exposures. methods for preventing, and detecting, technology enabled Fraud, Corruption and Cybercrime. Implements appropriate controls to prevent and detect the occurrence of technology enabled Fraud, Corruption and Cybercrime in accordance with relevance standards and contemporary and emerging practices. Assists the University and any Law Enforcement Agency in any investigation pertaining to allegations of technology enabled Fraud, Corruption, or Cybercrime occurring within, or against, the University.
Chief Operating Officer and Vice-President Operations (COO)	<ul style="list-style-type: none"> Ensures biennial reviews of the University's <i>Fraud and Corruption Control Plan</i> and supporting <i>Fraud and Corruption Risk Register</i> are undertaken in accordance with the University's <i>Resilience Management Framework</i>. For each detected occurrence of Fraud or Corruption, ensures a review is undertaken to assess the adequacy of the University's internal control structure. Ensures University Staff clearly understand their obligations under the <i>Fraud and Corruption Control Plan</i> and receive regular Fraud and Corruption awareness training and education.
Chief People Officer (CPO)	<ul style="list-style-type: none"> Custodian of the <i>Charter of Conduct and Values</i>, which is enforceable and outlines the University's expectations of its Staff. Responsible for pre-employment and employee declarations processes and procedures. Ensures that allegations of Staff misconduct are handled in accordance with the procedures provided for under the <i>Enterprise Agreement</i>.
Council	<ul style="list-style-type: none"> Oversees and monitors the assessment and management of the University's Fraud and Corruption risks. Receives reports of suspected Fraud and Corruption.
Deputy Director, Risk and Safety	<ul style="list-style-type: none"> Receives Fraud and Corruption allegations, conducts an initial assessment, and where substantiated refers the allegation for formal investigation. Any report that constitutes a Public Interest Disclosure will be handled under the Public Interest Disclosure Act 2012 (ACT).

WHO	RESPONSIBILITIES
	<ul style="list-style-type: none"> • Immediately reports any suspected or actual incidents of Fraud or Corruption. • Establishes and maintains the <i>Fraud and Corruption Risk Register</i>. • Coordinates Fraud and Corruption control management to ensure that the University's <i>Fraud and Corruption Control Plan</i> and supporting <i>Fraud and Corruption Risk Register</i> are reviewed in accordance with the University's <i>Resilience and Response Management Framework</i>. • Coordinates Fraud and Corruption risk assessments by: <ul style="list-style-type: none"> ○ reviewing the implementation of additional controls/strategies identified in this Plan and the <i>Fraud and Corruption Risk Register</i>; and ○ reporting to the Audit and Risk Management Committee twice each year. • Ensures all updates and changes to the University's <i>Fraud and Corruption Control Plan</i>, and any related rules, policies, procedures, and statements as to the University's expectations of Staff are communicated to all Staff. • Undertakes key management-initiated reviews of this Plan. • Implements control strategies as identified in the <i>Fraud and Corruption Risk Register</i> and <i>Conflict of Interest Registers</i> and this Plan. • Periodically reviews the effectiveness of the University's Fraud and Corruption prevention, detection and response strategies and controls, including this Plan.
Executive Deans/Directors/Managers	<ul style="list-style-type: none"> • Ensures Staff clearly understand their role and obligations in regard to Fraud and Corruption risk management, strategies and controls. • Ensures Staff are aware of the mechanisms for reporting incidents of suspected Fraud and Corruption and encourage Staff to report any suspected activity via the <i>Whistleblowing (and Public Interest Disclosure) Procedure</i>. • Undertakes Fraud and Corruption risk assessments and maintain Conflict of Interest registers in respect of their business plans and functional areas.
Vice-Chancellor & President (VC)	<ul style="list-style-type: none"> • Approves the <i>Fraud and Corruption Control Plan</i>. • Fosters an environment within the University which makes active Fraud and Corruption control the responsibility of all Staff and Students. • Ensures that there are appropriate strategies in place to prevent, detect and respond to Fraud and Corruption risks. • Ensures that there is appropriate resourcing to enable efficient and effective Fraud and Corruption control at the University. • Makes a final decision in respect of any investigation findings into suspected Fraud or Corruption (as is considered appropriate).

Section 8 – Records management

- (40) All information relating to, and arising out of, this Plan must be managed in line with the University's *Record and Information Management Policy*.
- (41) All information relating to the reporting of Wrongdoing is to be managed in line with the *Whistleblowing (and Public Interest Disclosure) Procedure*.

Section 9 – Definitions

TERMS	DEFINITIONS
Affiliates	Those people given Emeritus/Emerita and Honorary (including Adjunct, Professional Associate and Visiting) appointments in accordance with the relevant University policies and procedures.
Bribery	Defined by the AS 8001-2021 Fraud and Corruption Control as “offering, promising, giving or accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties.”
Corrupt Conduct	Means corrupt conduct as defined in section 9 of the Integrity Commission Act 2018 (ACT) .
Corruption	Defined by the AS 8001-2021 Fraud and Corruption Control as “dishonest activity in which a person associated with an organisation (e.g. director, executive manager, employee or contractor) acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of and in the interests of the organisation, in order to secure some form of improper advantage for the organisation either directly or indirectly.” For the purposes of this Plan, Corruption includes Corrupt Conduct, Serious Corrupt Conduct and Systemic Corrupt Conduct.
Cybercrime	Defined by the AS 8001-2021 Fraud and Corruption Control as “criminal activity where services or applications in the Cyberspace are used for or are the target of a crime, whether the Cyberspace is the source, tool, target, or place of a crime.”
Enterprise Agreement	Means the University of Canberra <i>Enterprise Agreement</i> .
Fraud	Defined by the AS 8001-2021 Fraud and Corruption Control as “dishonest activity causing actual or potential gain or loss to any person or organisation including theft of moneys or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediate following the activity.”

TERMS	DEFINITIONS
	<p>The AS 8001-2021 Fraud and Corruption Control notes that:</p> <ul style="list-style-type: none"> • Note 1: Property in this context also includes intellectual property and other intangibles such as information. • Note 2: Fraud also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit. • Note 3: While conduct must be dishonest for it to meet the definition of “Fraud” the conduct need not necessarily represent a breach of the criminal law. • Note 4: The concept of Fraud within the meaning of the Standard, can involve Fraudulent conduct by internal and/or external parties targeting the organisation or Fraudulent or corrupt conduct by the organisation itself targeting external parties.
Law Enforcement Agency	<p>Means one or more of the following agencies:</p> <ul style="list-style-type: none"> • ACT Integrity Commission; • ACT Policing; • Australian Border Force; • Australian Criminal Intelligence Commission; • Australian Federal Police; • Australian Taxation; or • Office National Anti-Corruption Commission.
Public Interest Disclosure or PID	<p>Means a special type of disclosure made under section 7 of the Public Interest Disclosure Act 2012 (ACT) which relates to maladministration or threats to public health or safety or the environment.</p>
Serious Corrupt Conduct	<p>Means serious corrupt conduct as defined under section 10 of the Integrity Commission Act 2018 (ACT).</p>
Staff	<p>A person who is a member of the University, whether full-time, part-time, continuing, fixed term, casual, or engaged under a third-party arrangement, and includes all academic, professional, technical and administrative officers and employees.</p>
Student	<p>As defined in the University of Canberra (Student Conduct) Rules 2023.</p>
Systemic Corrupt Conduct	<p>Means systemic corrupt conduct as defined under section 11 of the Integrity Commission Act 2018 (ACT).</p>
University	<p>Means the University of Canberra (ABN 81 633 873 422).</p>
Volunteer	<p>A person who donates their services in a voluntary capacity to the University without expectation of remuneration.</p>
Wrongdoing	<p>Wrongdoing means known or suspected conduct (including actions or omissions) that involves any one or more of the following:</p>

TERMS	DEFINITIONS
	<ul style="list-style-type: none"> • a breach of a state, national or international law; • Bribery; • Corruption (which includes Corrupt Conduct, Serious Corrupt Conduct and Systemic Corrupt Conduct as defined under the Integrity Commission Act 2018 (ACT)); • Disclosable Conduct (as defined under the Public Interest Disclosure Act 2012 (ACT)); • Fraud; or • a breach of the University's <i>Charter of Conduct and Values</i>, Statute, Rule, Policy or Procedure. <p>Wrongdoing includes known or suspected conduct that has happened in the past, is currently happening, or that may happen in the future.</p>

Status and details

Status	Current
Effective Date	10 September 2025
Review Date	10 September 2030
Approval Authority	Vice-Chancellor & President
Approval Date	4 September 2025
Custodian	Chief Operating Officer and Vice-President Operations
Responsible Manager	Deputy Director, Risk and Safety
Enquiries Contact	policy@canberra.edu.au

Appendix A – Examples of Fraud and Corruption Risks

Fraud and Corruption can occur in many different forms. Some examples of conduct that may constitute Fraud and Corruption either within or against the University of Canberra are included below. Please note that this is not an exhaustive list, and the examples included below are not exclusive to a particular area, position, operation or function of the University.

RISK	EXAMPLES OF FRAUD AND CORRUPTION	CORRESPONDING UNIVERSITY POLICY, PROCEDURE OR RULE
Abuse of power over staff and stakeholders	<ul style="list-style-type: none"> • Accepting a benefit from a third party to influence decision making, such as decisions relating to procurements, student entry, or academic records and results. • Forging or falsifying documents or signatures. • Paying a benefit to a third party to influence their decision-making (such as decisions relating to grants, permits, other agreements or government policy). • Seeking benefits or favours (financial and non-financial) in exchange for favourable treatment. • Using an official position inappropriately to gain an advantage for oneself or another person or to cause detriment to another. 	<ul style="list-style-type: none"> • Charter of Conduct and Values • Conflict of Interest Policy. • Delegations of Authority Policy • Procurement Policy and Procedure
Academic activity and research	<ul style="list-style-type: none"> • Fabrication or falsification of research data. • Including false information within applications for grants, sponsorships or other sources of funds. • Manipulation of academic course structures to benefit personal research. • Plagiarism and or unauthorised use of intellectual property or AI resources. • Accepting bribes from Students. • Creating fraudulent transcripts for Students. 	<ul style="list-style-type: none"> • Academic Integrity Policy and Procedure • Charter of Conduct and Values • Intellectual Property Policy and Procedure • Research Conduct and Governance Policy • Research Conduct and Complaints Procedure • University of Canberra (Student Conduct) Rules 2023
Applications for University courses and/or scholarships	<ul style="list-style-type: none"> • Providing false or misleading academic, financial or visa information as part of the University application and/or scholarship processes. • Fabrication or forgery of transcripts, testamurs, and qualifications. • Misrepresentation of applications by agents. 	<ul style="list-style-type: none"> • University of Canberra (Student Conduct) Rules 2023
Audit, legal and regulatory obligations	<ul style="list-style-type: none"> • Providing false or misleading information to the ACT Auditor-General, ACT Ombudsman, statutory authorities, regulatory bodies and Law Enforcement Agencies. • Withholding information when legally required to provide information. 	<ul style="list-style-type: none"> • Charter of Conduct and Values

RISK	EXAMPLES OF FRAUD AND CORRUPTION	CORRESPONDING UNIVERSITY POLICY, PROCEDURE OR RULE
Conflicts of interest or duty	<ul style="list-style-type: none"> • Failing to declare or manage a declared conflict of interest or conflict of duty. • Allowing personal or external relationship to improperly influence a decision. • Undertaking external work or employment in conflict with an obligation to the University without prior approval. • Engaging in nepotism or cronyism. 	<ul style="list-style-type: none"> • Additional UC Employment Procedure • Charter of Conduct and Values • Conflict of Interest Policy. • Employee Background Checks Policy • Outside or Additional Work Policy • Outside Work Procedure
Data and IT assets	<ul style="list-style-type: none"> • Accessing, using, releasing, altering or destroying of data to procure a personal benefit, benefit another, or cause a detriment to another. • Provision of usernames and passwords to unauthorised people in exchange for a benefit. • Using administrative privileges to gain access to accounts, work areas or systems to procure a benefit for oneself or another or to cause a detriment to another. 	<ul style="list-style-type: none"> • Charter of Conduct and Values • DITM and Records Management Policy Manual • Property, Plant and Equipment (PPE) Assets Policy
Travel	<ul style="list-style-type: none"> • False or misleading information in travel diaries. • Inappropriate or unauthorised expenditure while on authorised travel, or entertaining guests of UC. • Inappropriate or unauthorised travel at the University's expense. • Inflated or fraudulent travel or entertainment expense claims, or the intentional non-disclosure of travel or entertainment expense information. • Making false claims against the University's travel insurance policies. 	<ul style="list-style-type: none"> • Charter of Conduct and Values • Conflict of Interest Policy. • Corporate Credit Card Procedure • Delegations of Authority Policy • Travel Policy and Procedure
Gifts and entertainment	<ul style="list-style-type: none"> • Failing to declare the offer, and/or acceptance, of personal gifts, benefits and entertainment (including those provided to a related party). 	<ul style="list-style-type: none"> • Charter of Conduct and Values • Corporate Credit Card Procedure • Gifts and Fundraising Policy
Misappropriation of funds, intellectual property and resources	<ul style="list-style-type: none"> • Causing or creating a loss/liability intentionally or by deception. • Not using University resources for their intended purpose, such as: <ul style="list-style-type: none"> ○ using credit cards to purchase personal items. 	<ul style="list-style-type: none"> • Charter of Conduct and Values • Delegations of Authority Policy • Intellectual Property Policy and Procedure.

RISK	EXAMPLES OF FRAUD AND CORRUPTION	CORRESPONDING UNIVERSITY POLICY, PROCEDURE OR RULE
	<ul style="list-style-type: none"> ○ creating fictitious vendors or suppliers and initiating payments to facilitate payments to oneself. ○ purchase of unapproved assets or services. ● Sale or unauthorised transfer of University assets. ● Theft. 	<ul style="list-style-type: none"> ● Property, Plant and Equipment (PPE) Assets Policy ● Procurement Policy and Procedure
Procurement and contract management	<ul style="list-style-type: none"> ● Inflating charges or costs for goods or services. ● Manipulating a competitive procurement or tender process to obtain an improper benefit or advantage for any individual, third party, or the University. ● Negligent or deliberate mismanagement of contracts to obtain a personal benefit for oneself or another or to cause detriment to another. ● Unauthorised or improper release of pricing or other competitive procurement information to a third party. ● Accepting or soliciting bribes and/or kickbacks from suppliers. 	<ul style="list-style-type: none"> ● Charter of Conduct and Values ● Procurement Policy and Procedure ● Property, Plant and Equipment (PPE) Assets Policy ● Delegations of Authority Policy ● Conflict of Interest Policy
Salaries, wages and allowances	<ul style="list-style-type: none"> ● Altering salary amounts. ● Authorising allowances or regular payments to Staff for tasks/roles not performed or for skills they do not have. ● Payments to phantom (or ghost) Staff. ● Not recording leave taken or engaging in time sheet fraud. ● Falsely recording work to gain additional flexi-time or overpayment of wages. 	<ul style="list-style-type: none"> ● Charter of Conduct and Values
Staffing	<ul style="list-style-type: none"> ● Employment decisions motivated by a personal relationship and/or made without an appropriate merit assessment. ● Falsifying or unlawfully altering Staff records. ● Use or disclosure of Staff information for a dishonest or unauthorised purpose, such as extortion. 	<ul style="list-style-type: none"> ● Charter of Conduct and Values ● Conflict of Interest Policy ● Procurement Policy and Procedure
Student cheating	<ul style="list-style-type: none"> ● Assignment extension requests or exam deferral requests made using false or forged information (such as a fake medical certificate). ● Assignments or exams completed by another person or party (such as an essay writing service). ● Use of unauthorised aids to assist with examination procedures (such as a mobile phone, calculator, dictionary, AI). ● Plagiarism and or unauthorised use of intellectual property or AI services. 	<ul style="list-style-type: none"> ● Academic Integrity Policy and Procedure. ● Research Conduct and Complaints Procedure ● University of Canberra (Student Conduct) Rules 2023.

RISK	EXAMPLES OF FRAUD AND CORRUPTION	CORRESPONDING UNIVERSITY POLICY, PROCEDURE OR RULE
Foreign interference	<ul style="list-style-type: none"> • Inappropriate targeting and recruiting of Students and Staff to further a foreign actor's interests. • Attempts to obtain confidential or sensitive University information from Staff or Students by a foreign actor, or a person engaged on behalf of the foreign actor. • Conduct by a foreign actor that is inconsistent with the University's Charter of Conduct and Values, and which seeks to threaten academic freedom. • Conduct that seeks to inappropriately influence or direct the University's research agenda in particular areas of research by a foreign actor, or a person engaged on behalf of a foreign actor. 	<ul style="list-style-type: none"> • Academic Freedom and Freedom of Speech Policy • Charter of Conduct and Values • Outside or Additional Work Policy • Outside Work Procedure
Controlled and related entities	<ul style="list-style-type: none"> • Moving assets, equipment or expenses from one entity to another to avoid or evade taxation obligations. 	<ul style="list-style-type: none"> • Controlled and Related Entities Policy and Procedure