

FRAUD POLICY

Category	Finance
Policy Owner	Chief Financial Officer
Last review	January 2025
Next review	January 2030
Approved by	Vice Chancellor
Effective date	20 March 2025

1. PURPOSE

To ensure the assets and reputation of the University are protected from Fraud and to set out the rules for the prevention, detection and responses to suspected, or actual Fraud.

2. POLICY

1) Principles

The University has a zero tolerance to Fraud and its concealment. The University accepts its responsibility to be a good steward of University assets and has adopted practices and procedures to prevent and detect Fraud.

The University will:

- Ensure its processes to detect, manage and respond to actual or suspected Fraud comply with legal and audit requirements and met best practice standards.
- Fraud prevention controls will be implemented at all levels to ensure safeguards against Fraud are in place.
- The Chief Financial Officer will monitor Fraud related risk, as well as the effectiveness of the internal control environment.
- All Managers are responsible for:
 - ensuring compliance with internal controls and financial policies to mitigate the risk of fraud;
 - undertaking due diligence and all necessary measures, and remain vigilant in identifying and preventing fraudulent activities within their areas of responsibility; and
 - report suspected breaches in accordance with paragraph 3 of this Policy and in accordance with the Protected Disclosure Policy.
- Staff who may consider there are grounds for enquiry into Fraud must disclose this in accordance with the Protected Disclosures Policy. The University will treat all reports of suspected Fraud in confidence.

2) Identifying Fraud

Fraud refers to the intentional and dishonest act involving deception or misrepresentation to obtain, or potentially obtain, an unjust or illegal advantage for themselves or for another person. This includes, but is not limited to:

- Deliberately providing false, incomplete, or misleading information to the University;
- Forgery of University documents, records or computer files;
- Misappropriation of University funds, financial securities, supplies and/or other assets (including Intellectual Property) and records;

- Deliberate misreporting or mishandling of financial transactions including money transfers, reimbursement or grants;
- Seeking or accepting anything of material value in breach of the University's Sensitive Expenditure Policy and/or the Gifts, Koha and Donations Policy;
- Unauthorised use of University property, equipment, materials or records;
- Unauthorised disclosure of private, confidential or proprietary information;
- Accepting bribe or bribing another to perform or omit to perform, a University duty.

3) Reporting

Any member of the University Community who suspects that Fraud may be occurring, or may have occurred, must report this immediately in accordance with the Protected Disclosures Policy.

The disclosure of suspected Fraud can be made to:

- (a) their manager; or
- (b) their manager's manager; or
- (c) The Group Director People and Culture; or
- (d) Any member of the University Executive; or
- (e) General Counsel; or
- (f) the Vice-Chancellor - if they believe on reasonable grounds that a member of the University Executive or a member of Council may be involved in the Fraud or has a relationship or association with an alleged wrongdoer; or
- (g) the Chancellor or Pro Chancellor (if the allegation of Fraud involves a member of Council).

A disclosure of suspected Fraud will be dealt with promptly in accordance with the Protected Disclosure Policy.

A person who makes a disclosure of Fraud in accordance with the Protected Disclosure Policy is protected in accordance with the Protected Disclosure Policy.

Where an allegation of Fraud involves a Student, it will be dealt with in accordance with the Council Disciplinary Statute.

All proven incidents of Fraud will be pursued through appropriate means and disciplinary and other actions may be taken.

3. DEFINITIONS

Fraud: refers to the intentional and dishonest act involving deception or misrepresentation to obtain, or potentially obtain, an unjust or illegal advantage for themselves or for another person. This includes, but is not limited to:

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- Misappropriation of University funds, financial securities, supplies and/or other assets (including Intellectual Property) and records;
- Deliberate misreporting or mishandling of financial transactions including money transfers, reimbursement or grants;
- Seeking or accepting anything of material value in breach of the University's Sensitive Expenditure Policy or the Gifts, Koha and Donations Policy;
- Unauthorised use of University property, equipment, materials or records;
- Unauthorised disclosure of private, confidential or proprietary information;
- Accepting bribe or bribing another to perform or omit to perform a University duty.

Manager: means any staff member of the University with management responsibilities.

University Community: means staff, students, independent contractors, adjunct and visiting staff, visiting scholars and interns, professors emeriti and any other persons providing services to the University.

4. SCOPE

This policy applies to all University staff.

5. LEGISLATION AND COMPLIANCE

Crimes Act 1961

Protected Disclosures (Protection of Whistleblowers) Act 2022

6. RELATED PROCEDURES/DOCUMENTS

Protected Disclosures Policy

Sensitive Expenditure Policy

Gifts, Koha and Donations Policy

Conflicts of Interests Policy

Conflicts of Interests Procedures

Employee Discipline Policy

Employee Disciplinary Procedures

Council Disciplinary Statute

7. DOCUMENT MANAGEMENT AND CONTROL

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