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## Fraud Policy

### Governance Policy

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### 1 Purpose

The purpose of this policy is to address the risk of fraud and to lay out the actions the University will take when any suspected fraud is reported or discovered and should be read in conjunction with the [Student Conduct Statute](#) and [Conduct Policy](#) for the processes involved where academic fraudulent activities are suspected.

### 2 Organisational Scope

This is a University wide policy, which applies to the following persons:

- (a) employees the University;
- (b) employees of University subsidiaries;
- (c) students of the University;
- (d) adjunct and visiting staff;
- (e) visiting scholars and interns;
- (f) emeritus professors; and
- (g) any other persons providing services to the University (e.g. independent contractors).

### 3 Definitions

For purposes of this policy, unless otherwise stated, the following definitions shall apply:

**Fraud:** Fraud is defined as any dishonest act or omission that causes loss to the University or results in an unauthorised benefit or advantage, whether to the person acting or omitting or to a third person; and is deliberate or reckless in relation to the harm caused or the benefit or advantage obtained.

Fraud includes, but is not limited to:

- a) forgery or alteration of documents;
- b) misappropriation of University property;
- c) deliberately altering or reporting incorrect financial or personal information;
- d) seeking or accepting gifts from vendors, consultants or contractors doing business with the University except as provided for under the [Sensitive Expenditure Policy](#);
- e) unauthorised use of University property, equipment, materials or records for personal advantage or gain;

- f) authorising or receiving payment for goods or services not received or performed;
- g) authorising or receiving payment for time not worked;
- h) any claim for reimbursement of expenses that are not incurred for the benefit of the University;
- i) fabrication or falsification of data, plagiarism or other dishonest practices;
- j) bribery; and
- k) identity theft.

## 4 Policy Content and Guidelines

The University values the integrity of its staff and students, and relies on them to act at all times in an ethical and honest manner. It does not tolerate fraud and the concealment of fraud.

### 4.1.1 Duty to Report

- (a) An individual who is aware of or suspects fraudulent activity must promptly report such activity to the Chief Financial Officer or the Director, Human Resources.
- (b) An individual who reports a suspicion of fraud regarding another individual or the organisation in good faith will in no circumstances be threatened, intimidated, or dismissed because he or she acted in accordance with this policy.
- (c) The Chief Financial Officer or the Director Human Resources will notify either the Vice-Chancellor or Chancellor, as appropriate, of the suspected fraud.
- (d) If the Vice-Chancellor or Chancellor determines that an investigation is warranted, an investigation team will be established.

### 4.1.2 Investigations

- (a) The investigation team will be responsible for collecting all relevant information in respect of the fraud allegation.
- (b) Depending on the nature and seriousness of the alleged fraud, the Investigation Team may consult with, or engage the services of, other persons (such as technical experts with IT or forensic accounting skills) as well as external agencies (e.g. the Police and the University's Insurer).
- (c) The investigation team will have:
  - (i) free and unrestricted access to all University records and premises, whether owned or rented; and
  - (ii) the authority to examine, copy, and/or remove all, or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody or any such items or facilities, within the scope of the investigation.
- (d) If the investigation team concludes that the evidence it has collected does not support the allegation of fraud, that outcome shall be reported confidentially to the individual who was suspected of fraud and to the complainant. A confidential report will be provided to the Vice Chancellor or Chancellor as appropriate that sets out the investigation process undertaken and the conclusions reached. The disclosure of that report or any part of that report to any other person will be determined by the Vice-Chancellor or Chancellor.

- (e) If the investigation team concludes that there is sufficient evidence to support the allegation, it will provide the Vice-Chancellor or Chancellor with a confidential report which includes a recommended course of action and any recommended improvements to internal controls that are identified as a result of the investigation. A summary of this report will be provided to the Audit and Risk Committee.

#### 4.1.3 Disciplinary Processes

The University will follow the relevant disciplinary procedures (set out in the Conduct Policy or the Student Conduct Statute) in respect of persons suspected of having committed fraud.

#### 4.1.4 Actions Following Proved Fraud

Where a suspected fraud is proved, the University will:

- (a) Direct the manager of the area where the fraud has taken place, to put controls into place to mitigate further losses and prevent reoccurrence of similar misconduct.
- (b) Review the reasons for the incident, the measures taken to prevent a recurrence, and any action needed to strengthen future responses to fraud;
- (c) Advise the University's insurers as appropriate (depending on the nature of the fraud);
- (d) Keep all other relevant personnel suitably informed about the incident and the institution's response, including the Communications Manager.

#### 4.1.5 Recovery of Loss

Recovering losses of money or property is a major objective of the University following any fraud investigation. The amount of any loss will be quantified as far as possible and repayment or reparation will normally be sought.

#### 4.1.6 Dealing with the Media

Any person contacted by the media with respect to any fraud investigation shall refer the media to the Communications Manager (ext: 5873 or 027 563 5873).

## 5 Legislative Compliance

The University is required to manage its policy documentation within a legislative framework. The legislation directing this policy is the:

[Crimes Act 1961](#)

[Protected Disclosures Act 2000](#)

## 6 References

[Conduct Policy](#)

[Disclosure of Wrongdoing \(Whistleblower\) Policy](#)

[Sensitive Expenditure Policy](#)

[Student Conduct Statute](#)

[Travel and Expenses Policy](#)

[The Responsibilities and Duties of Public Entities](#); Office of the Auditor General

Previous version: [Fraud Policy](#)

## 7 Appendices

None

**8 Approval Agency**

Vice-Chancellor

**9 Policy Sponsor**

Chief Financial Officer

**10 Contact Person**

The following person may be approached on a routine basis in relation to this policy:

Manager, Financial Operations

Ext: 5910