
Fraud Policy

1. Purpose

The purpose of this Policy is to set out the rules for the prevention and detection of, and response to fraud at Te Herenga Waka – Victoria University of Wellington (the University).

2. Application of Policy

This Policy applies to all Members of the University Community.

Policy Content

3. Principles

3.1 The University does not tolerate fraud or its concealment and expects all members of its community to act in accordance with the [principle of kaitiakitanga](#) and [standards of conduct](#).

3.2 To put this zero-tolerance policy into practice, the University seeks to –

- (a) ensure its mechanisms and processes to manage and respond to suspected or actual instances of fraud are compliant with legal and audit requirements and maintained to the highest applicable standards;
- (b) embrace a preventive approach to minimise the risk of fraud by conducting [due diligence checks](#), implementing internal controls, and promoting awareness; and
- (c) maintain an environment where Members of the University Community feel comfortable speaking up about potential fraud risks and raising any concerns.

3.3 Managers, including Te Hiwa members, are responsible for promoting this Policy across the University.

4. Identifying Fraud

4.1 The term fraud refers to intentional act(s) involving the use of deception to obtain an unjust or illegal advantage. Examples of fraud may include, but are not limited to:

- (a) Knowingly providing false, incomplete or misleading information to the University;
Note: This includes supplying any false credentials to the University, such as identification cards, passports, diplomas, transcripts, and CVs.
- (b) Unauthorised possession, use, or misappropriation of University funds, property or records;
- (c) Deliberate mishandling of or misreporting money or financial transactions (including grants management);
Note: This includes authorising or receiving payment for goods or services not received or performed. It also includes false reimbursement claims.
- (d) Unauthorised use of University property, equipment, materials or records for personal advantage or gain;
- (e) Forgery or alteration of any document or computer file or record belonging to the University;

- (f) Providing or assisting in providing false, misleading, incomplete or fictitious information to circumvent the University's procurement processes,
 - (g) Accepting or seeking anything of material value from outside parties in breach of the University's [Conflicts of Interest Statute](#), [Sensitive Expenditure Policy](#), [Gift and Koha Policy](#) and other documents listed under Section 9 below;
 - (h) stealing personal information or using false or stolen identifying information (identity theft); and
 - (i) Unauthorised disclosure of private, confidential or proprietary information.
- 4.2 For the purpose of this Policy, corruption is considered a type of fraud, which includes bribery to perform or omit to perform a University duty.

5. Reporting

- 5.1 Members of the University Community who suspect that a fraudulent act may be occurring or may have occurred at the University must report this immediately.
- 5.2 Suspected instances of fraud should be reported to –
- (a) The Toi Tātai Pūtea – Chief Financial Officer; and/or
 - (b) The Toi Pūmanawa – Director, People and Capability; and/or
 - (c) The General Counsel.
- 5.3 Suspected instances of fraud can also be reported to a Manager.

Note: Sufficient information should be provided to enable investigation of the suspected fraud. This should include details about the events or acts constituting the suspected fraud or corrupt act, dates, times and persons alleged to be involved, together with any documentary evidence or verifiable facts that support the allegation.

- 5.4 Members of the University Community may prefer to make a protected disclosure under the Protected Disclosures (Protection of Whistleblowers) Act 2022. Please refer to the University's [Whistleblower Policy](#) for guidance on how to make protected disclosures.
- 5.5 Members of the University Community who report a suspicion of fraud in good faith will not be subjected to unfair treatment (such as retaliation) for having acted in accordance with this Policy.

6. Investigations

- 6.1 Following a preliminary assessment, the manager who receives a report under clause 5.2 will notify either the Tumu Whakarae – Vice-Chancellor or the Manukura – Chancellor as appropriate of the suspected fraud, along with a recommended course of action.
- 6.2 Where it is determined that an allegation of fraud involving a Member of the University Community (except Students) warrants further investigation, it will be dealt with in accordance with the [Staff Conduct Policy](#).
- 6.3 Where it is determined that an allegation of fraud involving a Student warrants further investigation, it will be dealt with in accordance with the [Student Conduct Statute](#).
- 6.4 In all other cases where an allegation of fraud warrants further investigation, the Vice-Chancellor or the Chancellor will determine the appropriate course of action and any necessary steps to be taken.
- 6.5 Any investigation into fraud will be conducted with unrestricted access to relevant University Precincts and records.

- 6.6 All information gathered in an investigation into fraud must be treated confidentially, except as required for thorough investigation and resolution of the complaint, to meet natural justice requirements, or as otherwise required by law.
- 6.7 Where it is determined that allegations do not warrant further investigation, the person suspected of fraud and the complainant shall receive confidential notification of the outcome. A confidential report that sets out the process undertaken and the conclusions reached will be provided to the Vice-Chancellor or Chancellor as appropriate. The disclosure of that report or any part of that report to any other person will be determined by the Vice-Chancellor or Chancellor.
- 6.8 A summary report for any investigation into fraud must be provided to the University's Audit and Risk Committee. Such reports must include recommended improvements to internal controls if warranted.
- 6.9 Media queries related to any fraud investigation must be referred to Director, Communications.

7. Non-compliance

- 7.1 Any alleged breach of this Policy will be handled in accordance with the [Staff Conduct Policy](#) or [Student Conduct Statute](#) (as appropriate).
- 7.2 Where allegations of fraud are substantiated, the University will usually take appropriate measures to recover any loss or expenditure attributable to fraud. This includes, but is not limited to recovery of: intellectual property, physical assets, money, third-party expenses incurred and investigation costs.
- 7.3 The University may refer allegations of fraud to the relevant New Zealand law enforcement agencies for investigation and possible prosecution. Nothing in this Policy prevents any individual from reporting a suspected crime to law enforcement agencies where they consider it appropriate.

8. Definitions

In this Policy, unless the context otherwise requires:

Manager	means any staff member of the University with management responsibilities, including Te Hiwa members.
Members of the University Community	means staff members, students, independent contractors, adjunct and visiting staff, visiting scholars and interns, professors emeriti and any other persons providing services to the University.
Staff Member	means an employee of the University.
Student	means any person enrolled in a personal course of study at the University or a person who is studying at the University under an exchange agreement with another institution and includes a resident in a Hall of Residence.
University Precincts	means all premises, grounds and buildings owned by, in possession of, or administered by the University.

Related Documents and Information

9. Related Documents

[Education and Training Act 2020](#)
[Victoria University of Wellington Act 1961](#)

[Crimes Act 1961](#)
[Privacy Act 2020](#)
[Protected Disclosures \(Protection of Whistleblowers\) Act 2022](#)

[Acceptable Use of Information Systems Statute](#)
[Conflicts of Interest Statute](#)
[Delegations Statute](#)
[Gift and Koha Policy](#)
[Intellectual Property Policy](#)
[Privacy Policy](#)
[Sensitive Expenditure Policy](#)
[Staff Conduct Policy](#)
[Student Conduct Statute](#)
[Te Tiriti o Waitangi Statute](#)
[Travel and Expenses Policy](#)
[Whistleblower Policy](#)

10. Document Management and Control

Essential Record

Approver	Tumu Whakarae – Vice-Chancellor
Approval Date	2 July 2024
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Policy Sponsor	Toi Tātai Pūtea – Chief Financial Officer
Policy Owner	Associate Director, Financial Operations

Modification History

Date	Approval Agency	Details
2 July 2024	Tumu Whakarae – Vice-Chancellor	Full review