Fraud and Corruption Risk Management Policy

1 Purpose

To provide the framework to sustain an organisational culture resistant to Fraud and Corruption.

2 Scope

This policy applies to University Members.

3 Policy Statement

The University recognises Fraud and Corruption control is a key component of its integrity framework to mitigate the risk of unacceptable costs or losses associated with its operations.

Consistent with the law and the University's Code of Conduct, the objectives of the integrity framework are to:

- encourage ethical conduct throughout the University and its activities through risk prevention strategies and education;
- protect the University's interests, assets and reputation; and
- uphold a transparent integrated approach to prevent and detect Fraud and Corruption matters.

4 Principles

1. Mitigation of Fraud and Corruption risk can only occur through the development of a Fraud and Corruption control framework involving a high level of governance and management direction.
2. Effective control involves identifying the University's key Fraud and Corruption risks.
3. To safeguard all aspects of the University's performance, an integrated control framework will be established to minimise and manage Fraud and Corruption risk.
4. Monitoring and review of the internal controls should be a normal part of the management process that can inform the development of an independent review and audit program.

Failure to comply with this Policy or Policy Instrument may be considered as misconduct and the provisions of the relevant Policy or Procedure applied. A hard copy of this electronic document is uncontrolled and may not be current as UniSQ the University regularly reviews and updates its Policies and Policy Instruments. The latest controlled version can be found in the UniSQ's Policy and Procedure Library.

5. The Employee induction and annual refresher program will include addressing Fraud and Corruption risk topics.

5 References

Crime and Corruption Commission Queensland (2018). *Fraud and Corruption Control: Best Practice Guide*. Crime and Corruption Commission (Queensland).

6 Schedules

This policy must be read in conjunction with its subordinate schedules as provided in the table below.

7 Policy Information

Accountable Officer	Vice-Chancellor
Responsible Officer	Chief Operating and Financial Officer
Policy Type	Governance Policy
Policy Suite	Fraud and Corruption Risk Management Procedure
Subordinate Schedules	
Approved Date	16/8/2026
Effective Date	16/8/2026
Review Date	16/8/2031
Relevant Legislation	*Crime and Corruption Act 2001* Crime and Misconduct Commission - Fraud and corruption control: Guidelines for best practice *Financial Accountability Act 2009* *Financial and Performance Management Standard 2019* *Information Privacy Act 2009* *Public Sector Ethics Act 1994* *Right to Information Act 2009*

Failure to comply with this Policy or Policy Instrument may be considered as misconduct and the provisions of the relevant Policy or Procedure applied. A hard copy of this electronic document is uncontrolled and may not be current as UniSQ the University regularly reviews and updates its Policies and Policy Instruments. The latest controlled version can be found in the UniSQ's Policy and Procedure Library.

	Public Interest Disclosure Act 2010 Standard AS8001:2021 - Fraud and corruption control Enterprise Agreement
Policy Exceptions	Policy Exceptions Register
Related Policies	Code of Conduct Policy Enterprise Risk Management Policy Privacy Policy Public Interest Disclosure Policy
Related Procedures	Privacy Procedure
Related forms, publications and websites	Financial Management Practice Manual
Definitions	**Terms defined in the Definitions Dictionary**
	Corrupt Conduct Defined in section 15 of the Crime and Corruption Act 2001 . Corruption See Schedule 2 of the Crime and Corruption Act 2001 . Council Council means the governing body, the University of Southern Queensland Council. Employee A person employed by the University and whose conditions of employment are covered by the Enterprise Agreement and includes persons employed on a continuing, fixed term or casual basis. Employees also include senior Employees whose conditions of employment are covered by a written agreement or contract with the University. Fraud Fraud is conventionally characterised by deliberate deception to facilitate or conceal the misappropriation of assets, tangible or

	intangible. Matters will be assessed against the Criminal Code Act 1899 . Fraud Investigation A Fraud Investigation is a search or collation of evidence connecting or tending to connect a person with conduct that infringes criminal law or the policies of the University. Public Interest Disclosure A public interest disclosure is a disclosure under Chapter 2 of the Public Interest Disclosure Act 2010 and includes all information and help given by the d iscloser to a Proper Authority for the disclosure. Student A person who is enrolled in a UniSQ Upskill Course or who is admitted to an Award Program or Non-Award Program offered by the University and is: currently enrolled in one or more Courses or study units; or not currently enrolled but is on an approved Leave of Absence or whose admission has not been cancelled. University The term 'University' or 'UniSQ' means the University of Southern Queensland. University Members Persons who include: Employees of the University whose conditions of employment are covered by the UniSQ Enterprise Agreement whether full time or fractional, continuing, fixed-term or casual, including senior Employees whose conditions of employment are covered by a written agreement or contract with the University; members of the University Council and University Committees; visiting, honorary and adjunct appointees; volunteers who contribute to University activities or who act on behalf of the University; and individuals who are granted access to University facilities or who are engaged in providing services to the University, such as contractors or consultants, where applicable.
	Definitions that relate to this policy only
	Other Definitions Readers should also refer to the University Code of Conduct and the Enterprise Bargaining Agreement as an additional glossary resource.

Failure to comply with this Policy or Policy Instrument may be considered as misconduct and the provisions of the relevant Policy or Procedure applied. A hard copy of this electronic document is uncontrolled and may not be current as UniSQ the University regularly reviews and updates its Policies and Policy Instruments. The latest controlled version can be found in the UniSQ's Policy and Procedure Library.

Keywords	Fraud, Corruption
Record No	13/329PL

Failure to comply with this Policy or Policy Instrument may be considered as misconduct and the provisions of the relevant Policy or Procedure applied. A hard copy of this electronic document is uncontrolled and may not be current as UniSQ the University regularly reviews and updates its Policies and Policy Instruments. The latest controlled version can be found in the UniSQ's Policy and Procedure Library.