

# Fraud and Corruption 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:

- foster ethical conduct throughout the University and its activities;
- protect the University's interests, assets and reputation;
- uphold a transparent integrated approach to prevent, detect and respond to Fraud and Corruption matters; and to
- encourage, support and protect individuals who report suspected Fraud and Corruption activity.

To that end, the University adopts a zero-tolerance approach to Fraud and Corruption across all of the University's activities. This requires University Members to not only be responsible for their own behaviour but to support others to embrace ethical practice.

## 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.
5. Robust mechanisms will be established to encourage and support the reporting of suspected cases of Fraud or Corruption by individuals from within and outside the University, including anonymous reports.
6. All reasonable measures will be taken to support a person who discloses suspected Fraud and Corruption, and provide protection from reprisal as a result of making a disclosure.
7. Allegations of Fraud or Corruption will be assessed, and where the pertinent criteria are established, a matter will be reported to the relevant external body including the:
  - a. Crime and Corruption Commission [section 38, 48A of the Crime and Corruption Act 2001]
  - b. Queensland Ombudsman [sections 33, 58 of the Public Interest Disclosure Act 2010]
  - c. Queensland Audit Office [section 21(3) of the Financial Management Practice Manual]
  - d. Queensland Police Service [section 21(3)(c) of the Financial Management Practice Manual]
8. Procedures defining the roles, responsibilities, authority and powers delegated to management and investigators will be used to determine the investigation approach commensurate with the nature and seriousness of a matter.
9. 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

|                              |   |
|------------------------------|---|
| <b>Accountable Officer</b>   | Vice-Chancellor   |
| <b>Responsible Officer</b>   | Chief Operating Officer and Chief Financial Officer   |
| <b>Policy Type</b>           | Governance Policy   |
| <b>Policy Suite</b>          | <a href="#">Fraud and Corruption Management Procedure</a>   |
| <b>Subordinate Schedules</b> |   |
| <b>Approved Date</b>         | 7/7/2025  |
| <b>Effective Date</b>        | 7/7/2025  |
| <b>Review Date</b>           | 9/3/2025  |
| <b>Relevant Legislation</b>  | <a href="#">Crime and Corruption Act 2001</a><br><a href="#">Crime and Misconduct Commission - Fraud and corruption control: Guidelines for best practice</a><br><a href="#">Financial Accountability Act 2009</a><br><a href="#">Financial and Performance Management Standard 2019</a><br><a href="#">Information Privacy Act 2009</a><br><a href="#">Public Sector Ethics Act 1994</a><br><a href="#">Right to Information Act 2009</a><br><a href="#">Public Interest Disclosure Act 2010</a><br><a href="#">Standard AS8001-2008: Fraud and Corruption Control</a><br><a href="#">Enterprise Agreement</a> |
| <b>Policy Exceptions</b>     | <a href="#">Policy Exceptions Register</a>  |
| <b>Related Policies</b>      | <a href="#">Code of Conduct Policy</a><br><a href="#">Enterprise Risk Management Policy</a><br><a href="#">Privacy Policy</a>   |

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](#).

|   |  |
|---|--|
|   | <a href="#">Public Interest Disclosure Policy</a>  |
| <b>Related Procedures</b>                       | <a href="#">Privacy Procedure</a>  |
| <b>Related forms, publications and websites</b> | <a href="#">Finance and Business Solutions Policies and Procedures</a><br><a href="#">Financial Management Practice Manual</a>   |
| <b>Definitions</b>                              | <p><b>Terms defined in the Definitions Dictionary</b></p> <p><a href="#">Corrupt Conduct</a></p> <p>Defined in section 15 of the Crime and Corruption Act 2001 .</p> <p><a href="#">Corruption</a></p> <p>See Schedule 2 of the Crime and Corruption Act 2001 .</p> <p><a href="#">Council</a></p> <p>Council means the governing body, the University of Southern Queensland Council.</p> <p><a href="#">Employee</a></p> <p>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.</p> <p><a href="#">Fraud</a></p> <p>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 .</p> <p><a href="#">Fraud Investigation</a></p> <p>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.</p> <p><a href="#">Public Interest Disclosure</a></p> <p>A public interest disclosure is a disclosure under Chapter 2 of the Public Interest Disclosure Act 2010 and includes all information and</p> |

|                  |   |
|------------------|---|
|                  | <p>help given by the discloser to a Proper Authority for the disclosure.</p> <p><a href="#">Student</a></p> <p>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.</p> <p><a href="#">University</a></p> <p>The term 'University' or 'UniSQ' means the University of Southern Queensland.</p> <p><a href="#">University Members</a></p> <p>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.</p> |
|                  | <p><b>Definitions that relate to this policy only</b></p>   |
|                  | <p><b>Other Definitions</b></p> <p>Readers should also refer to the University Code of Conduct and the Enterprise Bargaining Agreement as an additional glossary resource.</p>  |
| <b>Keywords</b>  | Fraud, Corruption   |
| <b>Record No</b> | 13/329PL  |