

# Fraud and Corruption Management Procedure



## 1 Purpose

To set out the processes by which the University will work to sustain an organisational culture resistant to Fraud and Corruption.

## 2 Scope

This procedure applies to University Members.

## 3 Procedure Overview

This procedure sets out the key responsibilities and contact points related to the implementation of processes designed to resist Fraud and Corruption.

## 4 Procedures

The Responsible Officer for the Policy will establish a Fraud and Corruption control framework for the University in accordance with the principles contained in the Fraud and Corruption Management Policy. This may involve the coordinated development of a Fraud and Corruption control plan and additional Policy Instruments considered necessary.

The Director (Risk Management, Compliance and Insurance) can assist management to assess Fraud and Corruption risk in the discrete functions and operations across the organisation to assist the Responsible Officer for the Policy to prepare a report that establishes the University's exposure to internal and external threats at least every three years.

Managers and supervisors are responsible for daily operation and maintaining reasonable internal control over processes within their area of responsibility and should report any material concern about Fraud control to the Responsible Officer for this Policy.

The design and operation of the internal control environment should be periodically reviewed independently of the management of discrete functions and operations responsible for establishing the internal control.

University Members are encouraged to report deficits of internal control or matters involving suspected Fraud or Corruption:

Internal control deficit	Director (Risk Management, Compliance and Insurance)
Fraud or Corruption matter	Director (Integrity and Professional Conduct)

Public Interest Disclosure	Director (Integrity and Professional Conduct)
	Vice-Chancellor
	University Council Member
	Director (Risk Management, Compliance and Insurance)

Having regard to external reporting obligations, the Vice-Chancellor has delegated the relevant powers and authority to assess whether matters about University Members meet the criteria for:

Corrupt Conduct	Director (Integrity and Professional Conduct)
Public Interest Disclosure Coordinator	Director (Integrity and Professional Conduct)
Law enforcement	Chief People Officer
	Director (Integrity and Professional Conduct)
Notify material loss	Chief Operating Officer and Chief Financial Officer

## 5 References

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

## 6 Schedules

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

## 7 Procedure Information

<b>Accountable Officer</b>	Chief Operating Officer and Chief Financial Officer
<b>Responsible Officer</b>	Chief Operating Officer and Chief Financial Officer
<b>Policy Type</b>	University Procedure
<b>Policy Suite</b>	<a href="#">Fraud and Corruption Management Policy</a>
<b>Subordinate Schedules</b>	
<b>Approved Date</b>	7/7/2025
<b>Effective Date</b>	7/7/2025
<b>Review Date</b>	13/3/2025

*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](#).*

<b>Relevant Legislation</b>	<a href="#"><i>Crime and Corruption Act 2001</i></a>  <a href="#">Crime and Misconduct Commission - Fraud and corruption control: Guidelines for best practice</a>  <a href="#"><i>Financial Accountability Act 2009</i></a>  <a href="#"><i>Financial and Performance Management Standard 2019</i></a>  <a href="#"><i>Information Privacy Act 2009</i></a>  <a href="#"><i>Public Sector Ethics Act 1994</i></a>  <a href="#"><i>Right to Information Act 2009</i></a>  <a href="#"><i>Public Interest Disclosure Act 2010</i></a>  <a href="#">Standard AS8001-2008: Fraud and Corruption Control</a>  <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>  <a href="#">Enterprise Risk Management Policy</a>  <a href="#">Privacy Policy</a>  <a href="#">Public Interest Disclosure Policy</a>  <a href="#">Social Media Policy</a>
<b>Related Procedures</b>	<a href="#">Privacy Procedure</a>  <a href="#">Social Media Procedure</a>
<b>Related forms, publications and websites</b>	<a href="#">Finance and Business Solutions Policies and Procedures</a>
<b>Definitions</b>	<b>Terms defined in the Definitions Dictionary</b>  <a href="#">Corruption</a>  See Schedule 2 of the Crime and Corruption Act 2001 .  <a href="#">Fraud</a>  Fraud is conventionally characterised by deliberate deception to

	<p>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="#">Policy Instrument</a></p> <p>A Policy Instrument refers to an instrument that is governed by the Policy framework. These include Policies, Procedures and Schedules.</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 help given by the d iscloser to a Proper Authority for the disclosure.</p>
	<b>Definitions that relate to this procedure only</b>
	<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>	19/1273PL