Corrupt Conduct Reporting Policy

1 Purpose

To establish the principles for reporting suspected Corrupt Conduct.

2 Scope

This policy applies to information and matters received by the University that may involve Corrupt Conduct as defined in the *Crime and Corruption Act 2001*.

This policy does not cover a Complaint that involves a Council member or a Complaint that involves or may involve Corrupt Conduct of the Vice-Chancellor. See the Policy on Complaints Involving Council Members and the Corruption Complaints About the Vice-Chancellor Policy.

3 Policy Statement

The University acknowledges the management of Corrupt Conduct is integral to good governance and management practice.

The Vice-Chancellor must ensure the Crime and Corruption Commission is notified if there is a Reasonable Suspicion that Corrupt Conduct has occurred.

All University Members have an obligation to report any suspicions or allegations of Corrupt Conduct.

The obligation to notify the Crime and Corruption Commission has been assigned by the Vice-Chancellor to the Chief People Officer or their nominee, allowing the person in this role to -

- receive or be notified of all Complaints raising possible Corrupt Conduct from external or internal sources;
- notify the Crime and Corruption Commission if they reasonably suspect that the Complaint involves, or may involve, Corrupt Conduct;
- prepare and retain complete and accurate records of any Decision to not notify the Crime and Corruption Commission of an allegation of Corrupt Conduct.

4 Principles

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.

To comply with the *Crime and Corruption Act 2001*:

- Complaints can be anonymous and need not be in writing, although details of the Complaint should be recorded in writing by the receiving officer. It should also be noted that it may be difficult to resolve an anonymous Complaint unless contact details are provided in the event further information is required from a complainant to be able to pursue the Complaint;

- an Employee who becomes aware of or suspects Corrupt Conduct must immediately report it to an appropriate authority;

- the University may take disciplinary action against an Employee who fails to report acts or suspicions of Corrupt Conduct - a failure to report suspected corrupt conduct can in itself be Corrupt Conduct;

- the Crime and Corruption Commission will be notified as soon as there is a Reasonable Suspicion that Corrupt Conduct has occurred subject to any directions issued to the Vice-Chancellor by the Crime and Corruption Commission;

- no action will be taken in relation to a Complaint involving Corrupt Conduct before notifying the Crime and Corruption Commission, other than considering information in the direct knowledge of a relevant officer or in the University's records to decide whether there is a Reasonable Suspicion of Corrupt Conduct;

- a record will be made by the Chief People Officer or their nominee of a Decision that a Complaint, information or matter, about alleged Corrupt Conduct is not required to be notified to the Crime and Corruption Commission;

- no further action will be taken after notifying the Crime and Corruption Commission before being advised of their assessment decision and any recommendations or directions about how to Deal with the matter;

- a Complaint, information or matter involving Corrupt Conduct that is referred to the University by the Crime and Corruption Commission will be Dealt with in the way the Vice-Chancellor considers most appropriate, subject to the Crime and Corruption Commission's monitoring role;

- when an Employee makes an allegation about the conduct of another person which would, if proved, be Corrupt Conduct, the information may also be a Public Interest Disclosure under the Public Interest Disclosure Act 2010 and the Employee will be entitled to certain protections. For more details, refer to the Public Interest Disclosure Policy;

- a person who makes a Complaint that is Dealt with by the University must be given a response unless the person has not given their name and address or does not require a response, or if the response would disclose information the disclosure of which would be contrary to the public interest;

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- the University will provide mandated training to ensure all University Members are made aware of their obligations contained in this policy;
- Managers should ensure all Employees under their supervision complete the mandated training and are aware of their obligations contained in this policy;
- the Chief People Officer or their nominee is responsible for the review of this document at least annually.

5 References

Corruption in focus: A guide to dealing with corrupt conduct in the Queensland public sector. (2020). Brisbane, Qld: Crime and Corruption Commission.

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 People Officer
Policy Type	Governance Policy
Policy Suite	Corrupt Conduct Resolution Procedure
Subordinate Schedules	
Approved Date	4/12/2025
Effective Date	4/12/2025
Review Date	27/1/2026
Relevant Legislation	*Crime and Corruption Act 2001* *Public Interest Disclosure Act 2010* (Qld) *Public Records Act 2023*
Policy Exceptions	Policy Exceptions Register
Related Policies	Code of Conduct Policy

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	Fraud and Corruption Risk Management Policy Public Interest Disclosure Policy Social Media Policy
Related Procedures	Public Interest Disclosure Procedure Social Media Procedure
Related forms, publications and websites	Enterprise Agreement Employee Complaints Form Your Call Website and Your Call Report Form
Definitions	**Terms defined in the Definitions Dictionary**
	Corrupt Conduct Defined in section 15 of the Crime and Corruption Act 2001 . 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.
	Definitions that relate to this policy only
	Complaint For the purpose of this policy, a Complaint involving Corrupt Conduct also includes an allegation or information or matter. **Conduct** As defined in section 14 of the *Crime and Corruption Act 2001*, conduct includes neglect, failure and inaction, conspiracy to engage in conduct and attempts to engage in conduct. **Deal with | Dealt with** Subject to any directions given by the Crime and Corruption Commission, dealing with a Complaint, information or matter referred to the University, includes:

	• make preliminary enquiries • take no action • management action • investigation • start a disciplinary process • report to the Crime and Corruption Commission about the handling of a matter in the way and at the times directed by the Crime and Corruption Commission. in accordance with the requirements and obligations provided by the Crime and Corruption Commission in the *Corruption in Focus* guide. **Professional Misconduct** Professional Misconduct is Conduct connected with exercising the skill of a professional or engaging in the performance of the specified duties or activities of a position. Professional Misconduct can also be Corrupt Conduct if it meets the elements under section 15 of the *Crime and Corruption Act 2001*. **Reasonable Suspicion** For a suspicion to be *reasonable*, there needs to be more than bare or idle speculation. There must be some evidence sufficient for a reasonable person to suspect Corrupt Conduct. This Reasonable Suspicion is the trigger point for how a suspected Corrupt Conduct matter is to be dealt with by the University, or referred to the Crime and Corruption Commission pursuant to section 38 of the *Crime and Corruption Act 2001*.
Keywords	
Record No	20/569PL

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