

# Fraud and Corruption Control Policy

## Section 1 - Background and Purpose

(1) As a public sector organisation, the University is entrusted with public funds and its staff members are expected to maintain the public trust by exhibiting the highest standards of integrity.

(2) This Policy will be used to protect the university, its operations, its assets and all members of the university community from the detriment associated with fraud or other corrupt activities.

## Section 2 - Scope

(3) This Policy applies across the entire University community, including:

- a. All employees whether through appointment, contract, temporary arrangement or volunteering; and
- b. Any external party involved in providing goods or services, to the University, such as contractors, consultants, outsourced service providers and suppliers.

## Section 3 - Policy Statement

(4) La Trobe University (the University) is committed to ensuring a high standard of integrity is applied across all areas of operations, and that all business is conducted with honesty, fairness and transparency and free from local and foreign interference.

(5) The University is committed to sustaining a culture of honesty, integrity and professionalism and does not tolerate fraud and corruption.

(6) The University ensures adequate financial fraud and corruption controls are maintained through a continuous process of improving awareness and proactive risk management to reduce the possibility and impact of fraud and corruption.

(7) All research and academic related fraud, bribery and corruption concerns are managed under the following policy provisions:

- a. [Research Integrity Policy](#)
- b. [Research Misconduct Procedure](#)
- c. [Student Academic Misconduct Policy](#)
- d. [Foreign](#)

(8) The University will take all reasonable steps to protect a person from any detrimental action in reprisal from making the disclosure of improper conduct under the [Public Interest \(Whistleblower\) Disclosure Policy](#).

(9) All employees across the University have a responsibility to safeguard themselves and the University against damage and loss through fraud or corruption activities.

## Section 4 - Procedures

(10) This Policy is supported by the [Fraud and Corruption Control Framework](#) which details proactive risk management procedures to prevent, detect and respond to any suspected or actual incidents of fraud, bribery or corruption, and associated reporting.

### Part A - Reporting Fraud, Corruption or Bribery - Public Interest Disclosure

(11) Any member of the University community, visitor to the University or member of the general public that wishes to make a complaint or report an incident involving the University or an officer of the University may do so as a protected disclosure under the [Public Interest Disclosures Act 2012](#).

(12) For details on how to make a public interest disclosure please refer to the University's [Public Interest \(Whistleblower\) Disclosure Policy](#). Public Interest Disclosures are made directly to [Independent Broad-based Anti-corruption Commission \(IBAC\)](#) and do not go through University notification processes.

### Part B - Reporting Fraud, Corruption or Bribery (Non Public Interest Disclosure)

(13) Where an allegation does not meet the IBAC determination, or a person wishes to make a non-protected disclosure directly to the University, reports of fraud or corrupt behaviour by members of the University may also be made to Risk, Audit and Insurance.

(14) Any person who wishes to report an incident or suspects a financial fraud may have been committed, may complete the [Fraud Allegation Form \(Online\)](#) and forward it to Risk, Audit and Insurance. Reports can be made anonymously. Persons should ensure that as much information regarding the incident is provided to enable full investigation of the allegation.

(15) Refer to the [Fraud and Corruption Control Framework](#) for further information and guidance.

## Section 5 - Definitions

(16) For the purpose of this Policy and Procedure:

- a. Bribery: providing, causing, offering or promising to provide any advantage to another person where the advantage is not legitimately due. The intention of the bribe must be to influence a foreign public official in the exercise of his or her official duties to obtain or retain business or a business advantage that is not legitimately due to that Australian person or Australian company.
- b. Corruption: dishonest activity in which an employee, volunteer or contractor acts contrary to the interests of the University and abuses their position of trust in order to achieve some personal gain or advantage.
- c. Fraud: dishonest activity causing actual or potential financial loss to any person or entity including theft of moneys or other property by employees or persons external to the entity and whether or not deception is used at the time, immediately before or immediately following the activity. This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.

- d. Public interest disclosure: a disclosure of information which is made in accordance of Part 2 of the [Public Interest Disclosures Act 2012](#). Any person making a disclosure of improper conduct by public officers and public bodies (including universities) is protected from any reprisal for disclosing the improper conduct.

## Status and Details

<b>Status</b>	Current
<b>Effective Date</b>	2nd February 2021
<b>Review Date</b>	2nd February 2024
<b>Approval Authority</b>	University Council
<b>Approval Date</b>	7th December 2020
<b>Expiry Date</b>	Not Applicable
<b>Responsible Manager - Policy</b>	Linda Robertson General Counsel & Director of Assurance
<b>Author</b>	Stacey Conlin
<b>Enquiries Contact</b>	Commercial, Legal and Risk