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## 1 PURPOSE

- 1.1 To outline the University's attitude to, and procedures for the control of, fraud and corruption at CQUniversity.

## 2 SCOPE

- 2.1 This policy applies to all areas, staff, officers and students of the University and its wholly owned subsidiaries.

## 3 POLICY STATEMENT

- 3.1 The University is committed to:
- taking a risk management approach to the prevention, identification and management of fraud and corruption
  - reducing or removing the potential for fraudulent or corrupt conduct
  - detecting fraudulent or corrupt conduct
  - investigating, or otherwise formally enquiring into, all instances of suspected fraudulent or corrupt conduct exposed as a result of our detection processes, or as a result of receiving an allegation of fraudulent or corrupt activities, and
  - managing, disciplining or facilitating the prosecution of those responsible for incidents of substantiated fraud and corruption as appropriate.

## 4 RESPONSIBILITIES

### Compliance, monitoring and review

- 4.1 Staff shall:
- apply the principles inherent in the University's Code of Conduct when undertaking their duties and/or representing the University

- take appropriate action in relation to suspected fraudulent or improper conduct within their area of responsibility
  - advise their supervisor of any concern, suspicion, or information of any instance of fraudulent, corrupt or improper conduct and encourage others to do the same, and
  - deal with all reports of suspected fraud or improper conduct in a professional and prompt manner.
- 4.2 School Deans/Directors shall:
- foster an environment that makes active fraud control the responsibility of all staff
  - identify and assess fraud risks, including current threats from internal and external sources as well as potential and emerging threats, and
  - ensure appropriate internal controls are in place and operating effectively to minimise fraud risks.
- 4.3 University Executives shall:
- foster an environment that makes active fraud control the responsibility of all staff.
- 4.4 The Deputy Vice-Chancellor (Student Experience and Governance) shall:
- be the first point of contact for all reported incidence of suspected fraud and advice on the appropriate course of action
  - determine the course of action following reported incidents of fraud including managerial action, investigation, and referral to the relevant police authority and the Crime and Corruption Commission
  - report incidents of suspected fraud to the Vice-Chancellor and President and take appropriate action, and
  - inform the University Audit, Risk and Finance Committee of any reported fraud and actions taken.
- 4.5 The Audit, Risk and Finance Committee shall:
- oversee fraud risks and the controls related to those risks, and
  - inform Council of any fraudulent instances reported and remedial actions taken.
- 4.6 Students shall:
- act in a responsible way and not perpetrate frauds against the University, and
  - apply the principles inherent in the University's Student Charter/Student Code of Conduct.

## **Public Interest Disclosures**

- 4.7 The University's procedure on [Public Interest Disclosures](#) establishes a disclosure process and provides protection for individuals making a disclosure and natural justice for those who are the subject of disclosures. All public interest disclosures made by University staff are to be managed in accordance with that procedure.

## **Reporting**

- 4.8 Reporting requirements are detailed within the responsibilities above.

## **Records management**

- 4.9 Staff must maintain all records relevant to administering this policy in a recognised University recordkeeping system.

## **5 DEFINITIONS**

- 5.1 Terms not defined in this document may be in the University [glossary](#).

## Terms and definitions

**Corruption:** Dishonest activity in which an employee of an organisation acts contrary to the interest of the organisation, in order to achieve some gain or advantage, or to avoid loss or disadvantage, for the employee or for another person or entity. Corruption can include, but is not limited to, behaviour such as fraud, deception, misuse of a position or authority.

**Fraud:** Dishonest activity causing actual or potential loss to any person or entity including theft of moneys or other property by employees or persons external to the entity and where 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 purpose or the improper use of information or position for personal benefit.

## 6 RELATED LEGISLATION AND DOCUMENTS

[Academic Misconduct Procedure](#)

[Code of Conduct](#)

[Crime and Corruption Act 2001 \(Qld\)](#)

[Risk Management Policy \(FMPM\)](#)

[Risk Management Framework and Guidelines](#)

[Public Interest Disclosure Act 2010 \(Qld\)](#)

[Public Interest Disclosure Management Policy and Procedure](#)

[Student Behavioural Misconduct Procedure](#)

## 7 FEEDBACK

7.1 University staff and students may provide feedback about this document by emailing [policy@cqu.edu.au](mailto:policy@cqu.edu.au).

## 8 APPROVAL AND REVIEW DETAILS

Approval and Review	Details
Approval Authority	Council
Advisory Committee to Approval Authority	Audit, Risk and Finance Committee
Administrator	Deputy Vice-Chancellor (Student Experience and Governance)
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Notes	