



FRAUD AND CORRUPTION PREVENTION FRAMEWORK

FIN-STA-03

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Objects of Excelsia College

Motivated by the Christian faith, as expressed by the Apostles' Creed and Nicene Creed, with fidelity to the Scriptures as the Word of God, the objects of the College are the advancement of the Christian faith and higher education.

1 Policy statement and principles

Effective fraud and corruption control requires the commitment and involvement of all employees, contractors, customers, students, and external service providers. It is therefore imperative that all individuals covered by the scope of this policy framework are aware of what is at risk and the types of fraud and corrupt behaviour that can occur.

The purpose of this policy framework is to protect the College's assets and reputation by:

- a. the promotion of an ethical environment and culture of honesty, integrity and professionalism, with zero tolerance for fraud and corruption, and encouraging the reporting of any instance of fraud or corrupt conduct
- b. the prevention of internally and externally instigated fraud and corruption through the College's commitment to identifying risks of fraudulent and corrupt activities and to establishing policies, controls and procedures for prevention and detection of these activities
- c. the timely detection and investigation of fraud and corruption, or suspected fraud and corruption
- d. ensuring that all fraud and corruption, or suspected fraud and corruption, is dealt with and reported appropriately.

1.1 Fraud and corruption

1.1.1 Ethical environment

- i. The College has zero tolerance for fraud and corruption. This is supported by the values and principles of the Staff Code of Conduct, Student Code of Conduct, the Academic Integrity Framework, and the Ethics Framework located in the Research Framework.
- ii. The College is committed to protecting all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits.
- iii. Consistent with its vision, mission and values, the College always requires all staff and students to act honestly and with integrity and to safeguard the resources for which they are responsible.

1.1.2 Prevention

- i. All staff and students are expected to take the initiative in understanding their duties related to preventing fraud and corruption. This involves following the guidelines outlined in this policy framework, speaking up if they suspect any corrupt or fraudulent behaviour, and suggesting ways to improve areas that need attention.
- ii. The College undertakes measures to prevent fraud and corruption by identifying and minimising factors that contribute to them. These measures include:

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- a. leadership and governance from the Board of Directors, Audit and Risk Committee, Management Committee, and senior staff
- b. policies and procedures in key areas of governance, finance, human resources, facilities, information technology, teaching and learning, and research
- c. codes of behaviour including the Staff Code of Conduct, Student Code of Conduct, and the Integrity and Respect Framework, which encourage and provide a system for the reporting of corrupt conduct, maladministration, and fraudulent activities.
- d. responsibility or accountability structures for the control of fraud and corruption within the College structure including Audit and Risk Committee, Academic Misconduct Committee, Research Misconduct Committee, Ethics Committee, and Admissions Committee.
- e. providing all staff with training and awareness of fraud and corruption and how they should respond to it if detected or suspected
- f. improving governance
- g. investigation procedures to deal with suspected fraudulent or corrupt activity, as outlined in this Framework
- h. checks for successful candidates for employment at the College in accordance with the College's recruitment procedures
- i. establishing preventive internal controls including regular internal audits that determine the effectiveness of governance, risk management and fraud control processes.

1.1.3 Detection

- i. The College integrates fraud and corruption detection activities, including regular fraud audits of each department, into its policy, practices and business plans and in accordance with its Risk Management policy and procedures. Specific detection measures include:
 - a. internal and external audits including fraud risk assessments
 - b. continuous monitoring
 - c. internal and external reporting channels which provide various ways in which a person may report suspected or actual fraud or corrupt behaviour at the College, including through the Whistleblowing Procedure outlined in the Integrity and Respect Framework.

1.1.4 Response

- i. If any College individual becomes aware of or has a reasonable suspicion of fraudulent or corrupt behaviour, they should promptly report it as per the Whistleblowing Procedure outlined in the Integrity and Respect Framework. Any reports will be kept confidential (while also ensuring procedural fairness) and investigated as necessary.
- ii. Any suspected case of fraud or corruption committed against the College will be thoroughly investigated in accordance with relevant legislation.

- iii. The College will, where appropriate, cooperate with relevant agencies including the Independent Commission Against Corruption, NSW Ombudsman, the Audit Office of NSW, and the NSW Police Force.
- iv. Adequate records of the investigative process must be made and stored securely and confidentially in accordance with the College's Information Management and Privacy Framework.
- v. Appropriate disciplinary action will be taken against anyone who is found guilty of corrupt conduct.
- vi. The College may take any necessary legal action to recover losses that are determined to have resulted from fraudulent or corrupt conduct.
- vii. Conflicts of interest will be dealt with under the College's Conflict of Interest Policy.

1.1.5 Reporting

- i. Suspected corruption, whether or not it involves a staff member of the College, will be reported to the Independent Commission Against Corruption.
- ii. The College may report to NSW Police any matters that, on reasonable grounds, concern or may concern a criminal offence. This includes fraud.
- iii. The Fraud Control Officer will report regularly to the Audit and Risk Committee and as appropriate in respect of any material incidents.

1.2 Use of corporate credit card

- i. The corporate credit card shall be used only to purchase resources for the College.
- ii. The corporate credit card may only be used by College staff.
- iii. Prior to purchase, all Purchase Orders must be approved by the Chief Executive or Chief Financial Officer.
- iv. The corporate credit card must not be used for:
 - salaries
 - loans to employees or contractors
 - payments for personal items or services.
- v. In support of the College's internal processes to maintain the integrity of all cash and financial information, corporate credit cards are to be used to pay for online products and services.

Non-compliance with this policy framework may result in disciplinary action in accordance with Excelsia College by-laws.

2 Scope

This policy framework applies to all staff, students, contractors, and associates of the College.

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Any research and academic misconduct by staff and students will be dealt with under the Research Framework, Academic Integrity Framework, the Staff Code of Conduct or the Student Code of Conduct.

This policy framework should be read in consideration of the College’s Risk Management Policy and Procedures, and the Whistleblowing Procedure located in the Integrity and Respect Framework.

3 Roles and responsibilities

The following stakeholders have a responsibility in relation to this policy framework.

Role	Responsibility
Assistant Accountant	<ul style="list-style-type: none"> • Processing Purchase Orders
Board of Directors, Audit and Risk Committee, Management Committee, and senior staff	<ul style="list-style-type: none"> • Providing leadership on minimising factors that contribute to fraud and corruption
Chief Executive Officer	<ul style="list-style-type: none"> • Ultimate responsibility for the prevention and detection of fraud • Ensuring that appropriate and cost-effective internal control systems are in place • Referring to, or notifying, any relevant external agencies of any allegations of fraudulent or corrupt behaviour that have been identified by the College
Chief Financial Officer	<ul style="list-style-type: none"> • Acting as the Fraud Control Officer • Maintaining the College insurance policy • Preparing, reviewing and amending the fraud and corruption control and response strategy as required • Reviewing the results of the fraud risk assessments • Coordinating the compliance with the annual review of fraud mitigation strategies • Ongoing reviews of controls
Fraud Control Officer	<ul style="list-style-type: none"> • Communicating and updating the Fraud and Corruption Prevention Framework and monitoring in conjunction with the Chief Executive Officer • Engaging external investigators to investigate matters arising from allegations of fraud or corruption where required • Authority to determine the required resources to assist with any investigation • Reporting regularly to Audit and Risk Committee on matters of fraud and corruption prevention
Senior Management, Heads of Departments, Heads of Schools, and Managers	<ul style="list-style-type: none"> • Preventing and detecting fraud and corruption and implementing and operating controls that minimise fraudulent and corrupt activity within their areas of responsibility • Performing initial enquiries regarding any complaints of fraudulent and corrupt activity, and assisting with any further investigations of fraudulent and corrupt activity

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	<ul style="list-style-type: none"> • Ensuring, in day-to-day operations, that there are mechanisms in place within their areas of control to assist with the: <ul style="list-style-type: none"> ○ assessment of the risk of fraudulent and corrupt behaviour through awareness of the risks and exposures inherent in their area of responsibility ○ promotion of staff awareness of ethical principles subscribed to by the College ○ education of staff about fraud prevention and detection ○ promotion of a positive and appropriate attitude towards compliance with laws, rules and regulations ○ prompt and positive responses to all allegations or indications of fraudulent or corrupt acts. • Establishing and maintaining adequate internal controls that provide for the security and accountability of College resources and prevent or reduce the opportunity for fraud and corruption to occur. Applicable internal controls include: <ul style="list-style-type: none"> ○ suitable recruitment procedures ○ segregation of duties ○ identification and declaration of conflicts of interest or stated interests ○ security (physical and information systems) ○ supervision and internal checks ○ approvals within delegated authority ○ reconciliations ○ budget control ○ regular review of management reports ○ clear reporting lines. • Where managers do not have the expertise to evaluate internal controls, they should call on support from the Fraud Control Officer
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4 Definitions

For the purpose of this policy framework, the following definitions apply.

Term	Definition
associates	Consultants, volunteers, visiting appointees and visitors to the College.
conflict of interest	A conflict of interest is a situation in which the impartiality of an officer in discharging their duties could be called into question because of the potential, perceived or actual influence of personal considerations, whether financial or other. The conflict in question is between official duties and obligations, on the one hand, and private interests on the other.
corruption or corrupt conduct	The Australian Standard on Fraud and Corruption Control (AS 8001:2021) defines corruption as: ‘Dishonest activity in which a

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person associated with an organization (e.g. director, executive, manager, employee or contractor) acts contrary to the interests of the organization and abuses their position of trust in order to achieve personal advantage or advantage for another person or organization.'

The *Independent Commission Against Corruption Act 1988* (NSW) defines corrupt conduct, as it affects a public authority, as: 'Corrupt conduct is any conduct of any person (whether or not a public official) that adversely affects, or that could adversely affect, either directly or indirectly, the honest or impartial exercise of official functions by any public official, any group or body of public officials or any public authority'. It could involve any of the following matters:

- official misconduct (including breach of trust, fraud in office, nonfeasance, misfeasance, malfeasance, oppression, extortion or imposition)
- bribery
- blackmail
- obtaining or offering secret commissions
- fraud
- theft
- perverting the course of justice
- embezzlement
- election bribery
- election funding offences
- election fraud
- treating
- tax evasion
- revenue evasion
- currency violations
- illegal drug dealings
- illegal gambling
- obtaining financial benefit by vice engaged in by others
- bankruptcy and company violations
- harbouring criminals
- forgery
- treason or other offences against the Sovereign
- homicide or violence
- matters of the same or a similar nature to any listed above
- any conspiracy or attempt in relation to any of the above.

Examples of corrupt conduct to which the College may be subject include:

	<ul style="list-style-type: none"> • payment of secret commissions (bribes) paid in money, or some other value, to a College staff member, which is related to a specific action or decision of the College staff member • release of confidential information for a purpose other than proper business, sometimes in exchange for either a financial or non-financial advantage • collusive tendering (the act of multiple tenderers for a particular contract colluding in preparation of their bids) • a College staff member manipulating a tendering process to achieve a desired outcome • conflict of interest involving a staff member acting in their own self-interest rather than the interests of the College • nepotism and cronyism where the appointee to a College position is inadequately qualified to perform the role to which they have been appointed, or not selected on merit • receiving personal benefits in exchange for assisting a consultant to gain work at the College.
<p>fraud</p>	<p>Fraud is recognised as a subset of corruption. The Australian Standard on Fraud and Corruption Control (AS 8001:2021) defines fraud as: ‘Dishonest activity causing actual or potential gain or loss to any person or organization including theft of moneys or other property by persons internal and/or external to the organization and/or where deception is used at the time, immediately before or immediately following the activity.’ Examples of potential fraud at the College include, but are not limited to:</p> <ul style="list-style-type: none"> • misappropriating College assets, including use of the College assets for private purposes • abuse of College property • abuse of College time • causing a loss to the College, or avoiding or creating a liability for the College by deception • claiming for travel entitlement to attend a course and then not attending the course and not reimbursing travel monies • evasion of fees due to the College • fabrication, falsification or plagiarism of research • false invoicing for goods or services never rendered • falsely misrepresenting the author of essays, assignments or research to the College • making cheques or internet banking payments out to false persons • making, using or possessing forged or falsified documents such as degrees or academic records • misapplying government grant monies

	<ul style="list-style-type: none"> • misappropriating official order forms to gain a personal benefit • obtaining an unjust advantage by misusing information gained during the course of employment with the College • providing false or misleading information to the College, or failing to provide information, where there is an obligation to do so • receiving ‘kickbacks’ or ‘secret commissions’ from a contractor • submission of exaggerated or wholly fictitious accident, harassment or injury claims • misuse of personal or sick leave • theft of cash or petty cash • theft of intellectual property • theft of plant, equipment or inventory • unauthorised transfer of College income • unlawful use of College computers, vehicles, internet, telephones and other property or services including operation of a private business using College facilities and time • using a College credit card for personal expenses and claiming them as College-related • using taxi vouchers for private purposes.
Fraud and Corruption Risk Assessment	The application of risk management principles and techniques in the assessment of the risk of fraud and corruption within an entity
investigation	A search for evidence connecting or tending to connect a person (either a natural person or a body corporate) with conduct that infringes the criminal law, or the policies and standards set by the affected entity
staff	A member of the academic staff, professional staff, management or senior executive
student	An individual already enrolled in a course at the College, studying either full-time or part-time. They may be either an overseas student or domestic student.

5 Procedures

5.1 Fraud and corruption prevention measures

- i. The fraud and corruption control and response strategy is prepared, reviewed and amended as required by the Fraud Control Officer.
- ii. Regular fraud audits of each Department will be undertaken by the Fraud Control Officer.
- iii. It is expected that Schools and Departments will review the results of fraud risk assessments at least annually to ensure that strategies developed during the most recent fraud risk assessment

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are reviewed for effectiveness and amended where necessary. The Fraud Control Officer will coordinate the compliance with the annual review of fraud mitigation strategies.

- iv. Where the College takes necessary legal action to recover losses that are determined to have resulted from fraudulent or corrupt conduct, in most cases this will be where the likely benefits of such recovery exceed the funds and resources invested in the recovery action. However, this does not prevent any decision to take recovery action.

5.1.1 Fraud and corruption risk assessment

When to conduct a fraud and corruption risk assessment

The College aims to conduct fraud risk assessments annually. Where appropriate, the College may introduce a rolling program of risk assessments.

When the College undergoes a substantial change in structure or function, or where there is a significant transfer in function (for example, as a result of outsourcing), the College may undertake further fraud risk assessment in relation to the changed functions. This fraud risk assessment may form part of a general business risk assessment exercise.

Who is involved in a fraud and corruption risk assessment

Staff at all levels in the College should be involved in the fraud and corruption risk assessment process, particularly those with detailed knowledge of the College's practices and procedures, because they understand system weaknesses and whether internal controls are being adhered to. The College recognises that it is important to ensure that the staff members involved have relevant training, access to all necessary information and an understanding of the areas to be examined.

What is assessed and documented

The College's risk assessments must consider fraud risks from both within the College and from external factors. Risk assessments must also consider fraud risks that may emerge in the future. For example, the College needs to be aware of the changing nature of fraud arising from the greater use of external service providers and developments in information technology. Core areas that a fraud risk assessment should cover include:

- information technology and information security
- electronic commerce, electronic service delivery and the internet
- outsourced functions
- grants and other payments or benefits programs
- tendering processes, purchasing and contract management
- intellectual property development and commercialisation
- revenue collection
- use of College credit cards
- travel allowances and other common allowances
- payments, including salaries
- property and other physical assets, including physical security.

The College documents the risk assessment process in order to:

- reflect the risks across the range of functions performed by the College
- measure risks in a comparable way
- provide a supportable rating of the risks of fraud including both likelihood of a risk occurring and consequences for the College if the risk did occur
- fine-tune the process, as appropriate
- replicate the process.

Fraud risk assessments provide details of the College's risk profile and vulnerability. Unauthorised access could substantially undermine the viability and effective management of the College. Therefore fraud risk assessments may be restricted in circulation, consistent with the sensitivity of the material or subject matter.

Integration of fraud and corruption risk assessment with overall risk assessment

It is important that fraud and corruption risks are considered in the broader context of overall business risk so that fraud risk assessment takes into account College-wide strategic planning. Fraud risk should not be looked at in isolation from the general business of the College. There is considerable overlap between enterprise risk, business risk, audit risk, security risk and fraud risk. Other risk management approaches may have already highlighted changes in strategic directions that will impact on future fraud risk profiles and control frameworks.

5.1.2 Internal audit review

The College internal audit review includes ongoing reviews of controls by the Chief Financial Officer and Honorary Treasurer within the College, including:

- reviewing the effectiveness of controls – how they are implemented in practice – via observation, interview of key personnel, review of records and sample testing
- systems type testing – detailed walkthrough of significant processes
- special audits where particular areas of concern have been identified.

5.1.3 Implementation of proposed actions

All fraud and corruption risks rated as having a high or very high level of residual seriousness require one or more proposed actions aimed at achieving one or more of the following:

- informing new staff during induction training
- delivering fraud awareness across as much of the College as possible.

In these cases, core areas of a fraud risk assessment should also include:

- alteration of existing internal control procedures
- new internal control procedures
- procedures aimed at detecting fraud
- fraud prevention strategies.

The College may also develop proposed actions for risks assessed as being a lower residual risk. To ensure comprehensive implementation and provide a periodic check on progress, the risk assessment

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teams should, where possible, allocate personal responsibility for the implementation of each action item.

It is expected that the Fraud Control Officer will review the results of the fraud risk assessments annually to ensure that strategies developed during the course of the most recent fraud risk assessment are reviewed for effectiveness and amended where necessary.

The Fraud Control Officer coordinates the compliance with the annual review of fraud mitigation strategies.

5.2 Insurance related to fraud and corruption

The College is covered by Unimutual Property Protection. The insurance is renewed on an annual basis. This insurance covers physical loss, destruction or damage to all real and personal property of every kind and description belonging to the College or for which the College is responsible or has assumed responsibility to insure prior to the loss. The two components relevant to this strategy include:

- fidelity
- burglary and theft.

There is currently an excess on each claim. The policy covers any person acting as an agent of the College in carrying out their duties at the College.

5.3 Corporate credit card

The corporate credit card may only be used to pay for College incidentals and to purchase products where a payment by invoice is not available.

Except for small expenses incurred by the cardholders, a Purchase Order must be raised and include the anticipated date of purchase, full description of goods, and signature of claimant and supervisor or department head. Purchases must be within budget for the relevant department. The Purchase Order must be signed by the Chief Financial Officer, and the Chief Executive where required by delegation limits.

Payment to the credit card will be made within one week of purchase documentation being supplied to the Assistant Accountant.

Itemised receipts must be returned within two working days to the Finance Department with the Purchase Order to trigger payment of card balance.

6 Guidelines

6.1 Fraud and corruption prevention

6.1.1 Assets vulnerable to fraud and corruption

The outcomes of committing fraud can be either tangible or intangible and can involve misuse of:

- academic records or qualifications
- admittance to a program or course
- consulting fees
- curriculum material
- College time
- examination results
- funding
- grants
- insurance claims
- internet time
- motor vehicles
- payroll
- personal information
- petty cash
- property, plant and equipment
- research information
- rights and ownership of new inventions
- supplies
- telephone calls
- time.

6.1.2 Perpetrators of fraud and corruption

It is possible for anyone to commit fraud or corruption. It can be done alone or in collusion with others within or outside the College. Fraud or corruption could be perpetrated against the College by:

- a full-time, part-time or casual staff member
- temporary or agency employee
- a student
- an agent
- an external individual
- a contractor or service provider.

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6.1.3 Fraud and corruption awareness

College staff and students should be informed about the College's Fraud and Corruption Prevention Framework, and what part they are expected to play. The College will achieve this in a number of ways, including:

- informing new staff during induction training
- delivering fraud awareness across as much of the College as possible
- making the key attributes of the Fraud and Corruption Prevention Framework available to all staff
- incorporating reminders to staff and students of their obligations to ethical conduct and public duties into policies, procedures, appointment letters, guidelines, training, and student and/or staff communications.

Fraud and corruption control requires continuous discussion. This may include:

- keeping track of what other higher education institutions are doing regarding policies and procedures
- ensuring reports or reviews of fraud and corruption at Australian higher education institutions are assessed for their likely impact on the College's strategy
- encouraging innovation in fraud and corruption control development, procedures and processes by staff.

6.1.4 Fraud and corruption detection

The early detection of fraud and corruption is an essential element of the College's prevention strategy.

Surveys of fraud conducted in Australia regularly demonstrate that employees are the most likely to discover fraud. College staff and students are therefore key in detecting fraudulent or corrupt behaviour within the College.

Staff and students should aim to detect fraud or corruption as soon as possible after it occurs. There are a number of ways in which fraud may be detected. These may include:

- monitoring high-risk jobs or areas
 - when internal controls are breached
 - during monthly reviews of strategic management reports such as telephone usage reports
- targeted post transactional reviews that may indicate altered or missing documentation, falsified or altered authorisation or inadequate documentary support
- departmental reviews or internal audits
- when staff or students notice changes in behaviour patterns such as unusual behaviour or expensive lifestyles of other staff members.

7 Document status and governance

Responsible Officer	Chief Financial Officer	Date created: September 2023 Date of last review: September 2023
Approving Authority	Board of Directors	Meeting date: 7 December 2023 Agenda item number: 7B1
Endorsement	Management Committee	Meeting date: 13 October 2023 Agenda item number: 8.2
	Audit and Risk Committee	Meeting date: 2 November 2023
Publication	Version 1 (Public)	December 2023
Related documents and references	<p>External documents</p> <p>Australian Standard on Fraud and Corruption Control (AS 8001:2021)</p> <p>Commonwealth Fraud Framework 2017</p> <p>Independent Commission Against Corruption Act 1988 (NSW)</p> <p>Public Governance, Performance and Accountability Act 2013 (Cth)</p> <p>Internal documents</p> <p>ACA-STU-01 Academic Integrity Framework</p> <p>FIN-STA-01 Financial and Administration – Staff Framework</p> <p>FRA-RES-02 Research Framework</p> <p>GOV-GS-STA-01 Staff Code of Conduct</p> <p>GOV-GS-STU-01 Code of Conduct for Students</p> <p>GOV-STA-04 Information Management and Privacy Framework</p> <p>HAN-STA-01 Staff Handbook</p> <p>HR-STA-03 Integrity and Respect Framework</p> <p>PO-GEN-15 Risk Management Policy and Procedure</p> <p>PO-STA-04 Conflict of Interest Policy</p>	
HESF	6.1, 6.2, 6.3, 7.3	
Review date	Review of Version 1	December 2026

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8 Document history

This policy framework has been amended as follows:

Version	Approved by and date	Sections amended