



**EXCELSIA
COLLEGE**
— Sydney —

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.

Document Number

PO-FIN-07

Document Name

FRAUD AND CORRUPTION PREVENTION POLICY

Document Status

Owner	Chief Financial Officer	September 2012
Approving Authority	Board of Directors	September 2012
Publication	Version 3 (Public)	November 2020
Review Date	Review of Version 3	November 2023

This document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Anyone printing this document should refer to the website/QMS for the latest version.

©2017 Excelsia College. All Rights Reserved. ABN: 50 360 319 774 CRICOS Provider Code: 002664K

1 Policy Statement

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

- reinforcing senior management's commitment and responsibility for identifying risk exposures to fraudulent and corrupt activities and for establishing policies, controls and procedures for prevention and detection of these activities
- reinforcing the requirement for all staff and others to refrain from corrupt conduct and fraudulent activities and encourage the reporting of any instance of fraud or corrupt conduct
- ensuring that all suspected fraudulent and corrupt activity is dealt with appropriately.

Effective fraud and corruption control require the commitment and involvement of all employees, contractors, customers and external service providers. It is therefore imperative that we are all aware of what within the College is at risk and the types of fraud and corrupt behaviour that can occur.

Statement of Attitude to Fraud and Corruption

Consistent with its vision, mission and values, the College requires all staff and students at all times to act honestly and with integrity and to safeguard the public resources for which they are responsible. The College is committed to protecting all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits.

Any fraud or corruption committed against the College is a major concern. Consequently, any case will be thoroughly investigated, and appropriate disciplinary action will be taken against anyone who is found guilty of corrupt conduct. This may include referral to the police.

The College has an obligation to report suspected corruption, whether or not it involves a staff member of the College, to the Independent Commission Against Corruption.

The College endeavours to make its staff, students, contractors, suppliers and clients aware of its statement of attitude to fraud and corruption by posting it on the College's website.

2 Scope

This policy applies to all staff, students and contractors of Excelsia College.

3 Responsibility

Successful implementation of the Fraud and Corruption Prevention Policy requires the recognition and documentation of the roles and accountabilities of staff. The College recognises that by embedding these requirements into the day-to-day operations of the College it will reduce the likelihood that it will suffer financial loss or damage to its reputation as a result of misconduct by staff and others.

This document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Anyone printing this document should refer to the website/QMS for the latest version.

©2017 Excelsia College. All Rights Reserved. ABN: 50 360 319 774 CRICOS Provider Code: 002664K

- **Chief Executive Officer.** The Chief Executive Officer has the ultimate responsibility for the operation of the College, including the prevention and detection of fraud and is responsible for ensuring that appropriate and cost-effective internal control systems are in place. The Chief Executive Officer, or the Chief Executive Officer's duly appointed delegate, has the responsibility of referring to, or notifying, any relevant external agencies of any allegations of fraudulent or corrupt behaviour that have been identified by the College.
- **Fraud Control Officer.** The Fraud Control Officer, currently the Chief Financial Officer, will promulgate and update the Fraud and Corruption Prevention Policy and monitor in conjunction with Chief Executive Officer. There may be occasions where the Fraud Control Officer requires the use of external investigators to investigate matters arising from allegations of fraud or corruption. The Fraud Control Officer has the authority to determine the required resources to assist with any investigation.
- **Senior Management, Heads of Departments, Heads of Schools, and Managers.** All levels of management are responsible for the prevention and detection of fraud and corruption and for the implementation and operation of controls that minimise fraudulent and corrupt activity within their areas of responsibility.

Management may also be called upon to perform the initial enquiries regarding any complaints of fraudulent and corrupt activity, and will assist with any further investigations of fraudulent and corrupt activity. It is the responsibility of all managers, in their day-to-day operations, to ensure that there are mechanisms in place within their areas of control to assist with the:

- 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.

Importantly, management should establish and maintain adequate internal controls that provide for the security and accountability of College resources and prevent/reduce the opportunity for fraud and corruption to occur. Applicable internal controls include:

- suitable recruitment procedures
- segregation of duties
- identification and declaration of conflict of interest or stated interests
- security (physical and information systems)
- supervision and internal checks

This document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Anyone printing this document should refer to the website/QMS for the latest version.

©2017 Excelsia College. All Rights Reserved. ABN: 50 360 319 774 CRICOS Provider Code: 002664K

- 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.

4 Definitions

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

Corruption

The Australian Standard on Fraud and Corruption Control defines corruption as:

“Dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.”

The Independent Commission Against Corruption (ICAC) defines corrupt conduct, as it affects a public authority, as:

“Corrupt conduct is also any conduct of any person (whether or not a public official) that adversely affects, or that could adversely affect, either directly or indirectly, the exercise of official functions by any public official, any group or body of public officials or any public authority and which 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

This document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Anyone printing this document should refer to the website/QMS for the latest version.

©2017 Excelsia College. All Rights Reserved. ABN: 50 360 319 774 CRICOS Provider Code: 002664K

- treating
- tax 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 Excelsia College may be subject include:

- 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 he or she has been appointed, or not selected on merit
- receiving personal benefits in exchange for assisting a consultant to gain work at the College.

Fraud

Fraud is recognised as a subset of corruption. The Australian Standard on Fraud and Corruption Control AS8001-2003 defines fraud as:

“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.”

This document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Anyone printing this document should refer to the website/QMS for the latest version.

©2017 Excelsia College. All Rights Reserved. ABN: 50 360 319 774 CRICOS Provider Code: 002664K

Examples of potential fraud at the College include, but are not limited to:

- 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
- 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.

5 Principles

5.1 Fraud Risk Management (Including Fraud Risk Assessment)

The College will integrate fraud control risk management into its philosophy, practices and business plans and believes risk management should be the business of all staff. Fraud audits of each Department will be undertaken regularly by the Fraud Control Officer.

This document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Anyone printing this document should refer to the website/QMS for the latest version.

5.2 Fraud and Corruption Awareness

One of the most common ways in which fraud and corruption is detected is by observation, investigation and reporting by those who work with, or deal directly with, the perpetrator(s). The College aims to provide all staff with a general awareness of fraud and corruption and how they should respond to it if detected or suspected.

5.3 Recovery of the Proceeds of Fraudulent or Corrupt Conduct

The College may take any 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 will exceed the funds and resources invested in the recovery action. However, this will not preclude any decision to take recovery action.

5.4 Review of Fraud Control Arrangements

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

5.5 Conflict of Interest Policy

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.

The College recognises that potential conflicts of interest can arise from personal, professional and social associations of staff both inside and also outside the College. These associations can create conflicts of interest in contracting for services, the procurement process, engaging consultants, academic staff and undertaking consultancies and recruitment.

Dealing with conflict of interest is an integral part of establishing an ethical culture at the College. Please refer to Excelsia College's Conflict of Interest Policy.

6 Related Documents and References

FIN-G01 Fraud and Corruption Prevention Guidelines

PO-STA-04 Conflict of Interest Policy

7 Mapped to HESF

The content of this policy is mapped to the HESF 6.

This document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Anyone printing this document should refer to the website/QMS for the latest version.

©2017 Excelsia College. All Rights Reserved. ABN: 50 360 319 774 CRICOS Provider Code: 002664K

8 Document History

This policy has been amended as follows:

Version	Amendments / Date / Notes
Version 3	Updated to new template.

This document may be varied, withdrawn or replaced at any time. Printed copies, or part thereof, are regarded as uncontrolled and should not be relied upon as the current version. Anyone printing this document should refer to the website/QMS for the latest version.

©2017 Excelsia College. All Rights Reserved. ABN: 50 360 319 774 CRICOS Provider Code: 002664K