

Fraud and Corruption Control Policy

1. PURPOSE

To provide the University with a highly visible, overarching framework that provides for the ongoing and effective management of fraud and corruption risks.

2. POLICY STATEMENT

- 2.1 The University will promote and maintain a values-based organisational culture that has zero tolerance for any fraudulent or corrupt conduct, whether committed against the University (from internal or external sources), or by or in the name of the University.
- 2.2 Should fraudulent or corrupt conduct be suspected or detected, the University will vigorously investigate such matters in an efficient and timely manner, and seek to recover, on a cost/benefit basis, the losses incurred.
- 2.3 The University will establish effective, risk-proportionate operational controls and processes for preventing, detecting and responding to fraudulent or corrupt conduct. The University's expectations in relation to these controls and procedures will be communicated by way of an approved Fraud and Corruption Control Plan ("the Plan"), which will align principally with the Australian Standard Fraud and Corruption Control (AS8001:2008), but will also consider other relevant external standards, best practice statements and the need to comply with local, national and international legislation and regulations.
- 2.4 The University will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates.

3. RESPONSIBILITY FOR IMPLEMENTATION AND COMPLIANCE MONITORING

3.1 Council

The Council is accountable for overseeing and monitoring the assessment and management of fraud and corruption risk.

3.2 Audit, Risk and Compliance Committee

The Audit, Risk and Compliance Committee provides an objective and robust view to the Council on the adequacy and effectiveness of the Plan in the management of fraud and corruption risk.

3.3 Vice-Chancellor

The Vice-Chancellor will ensure the Plan sufficiently addresses all potential fraud and corruption risks and ensures that appropriate action is being taken to mitigate those risks.

4. SCOPE OF POLICY

This policy applies to the University community, which includes Council members, students, staff, University Associates, Curtin controlled entities, and all persons participating in University business or activities, including whether as a visitor, adjunct appointee, service provider or contractor.

5. DEFINITIONS

(Note: Commonly defined terms are located in the [Curtin Common Definitions](#). Any defined terms below are specific to this document)

Bribe

The offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or legal duty.

Corruption

Dishonest activity in which a person abuses his/her position of trust in order to achieve some personal gain or advantage for themselves, or provide an advantage/disadvantage for another person or entity.

External parties

External individuals or entities with whom the University engages, transacts or associates in the achievement of its objectives (e.g., joint venture partners and collaborators, agents and intermediaries, and contractors and suppliers).

Facilitation payment

An illegal or unofficial payment made in return for services which the payer is legally entitled to receive without making such payment. It is normally a relatively minor payment made to a public official or person with a certifying function in order to secure or expedite the performance of a routine or necessary action, such as a visa, work permit or customs clearance.

Fraud

Dishonest activity causing actual or potential financial loss to any person or entity including theft of personal identity, money or other property by employees or persons external to the University 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 business purpose or the improper use of information or position for personal financial benefit. The concept of fraud involves fraudulent or corrupt conduct by internal parties or external entities targeting the University, or fraudulent or corrupt conduct by the University itself targeting external entities.

6. SUPPORTING PROCEDURES

Nil

7. RELATED DOCUMENTS/LINKS/FORMS

Fraud and Corruption Control Plan

[Fraud and Corruption Prevention website](#)

[Code of Conduct](#)

[Risk Management Policy](#)

[Risk Management Procedures](#)

[Compliance Policy](#)

[Compliance Procedures](#)

[Complaints Procedures](#)

[Conflict of Interest Procedures](#)

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| Policy Compliance Officer | Steven Tamigi , Director, Risk Compliance & Audit |
| Policy Manager | Chief Operating Officer |
| Approval Authority | Senior Executive Team |
| Review Date | 1 st April 2024 |

REVISION HISTORY

| Version | Approved/ Amended/ Rescinded | Date | Committee / Board / Executive Manager | Approval / Resolution Number | Key Changes and Notes |
|---------|------------------------------------|------------|--|---------------------------------|-------------------------------------|
| New | Approved | 27/10/2015 | Planning and Management Committee | PMC 79/15 | Attachment A to Item 13 |
| | Administratively Updated | 25/01/2017 | Director, Legal and Compliance Services | | Approval Authority updated |
| | Noted | 07/03/2019 | Planning and Management Committee | PMC 08/19 | Reviewed and no changes required |