

Anti-Fraud and Corruption Policy

Version number	2
Approved by	Corporate Governance Board
Date of approval	06/01/2021

Purpose

Acts of fraud and corruption, regardless of their scale, compromise the integrity of Sydney Institute of Higher Education (SI) operations and represent a major risk to SI. SI is committed to preventing, minimising, identifying and responding to fraud and corruption, not only to protect SI operations but also to maintain the positive reputation of the Australian higher education sector.

The *Anti-Fraud and Corruption Policy* describes the procedures that all SI staff and students must follow to prevent and address fraud and corruption.

Scope

This policy applies to all staff and students at SI.

Principles

SI recognises its obligations under the *Corporations Act 2001* as administered by the Australian Securities and Investments Commission (ASIC).

SI must prevent, identify, and address fraud and corruption and foster a culture of integrity, ethics, and trust in its community.

SI is dedicated to maintaining transparency, impartiality, and confidentiality, and prioritising staff and student welfare throughout these processes.

SI acknowledges that a report of fraud and corruption from an individual involved in SI's business operations (a 'whistle-blower') presents an opportunity for improvement. Whistle-blowers will be afforded protections in line with the principles outlined in this policy and SI's legal responsibilities.

Procedures

Responsibilities

It is the responsibility of the *Corporate Governance Board* to:

- Ensure SI complies with its own *Constitution*, policies and procedures

- Maintain up-to-date knowledge of and ensure compliance with relevant Australian laws and regulations
- Inform all staff and students of their rights and responsibilities through induction, orientation, and ongoing training and education
- Regularly review the policies and procedures surrounding fraud and corruption
- Inform staff and students of any changes to policies and procedures
- Review and address reports of fraud and corruption
- Address the underlying causes of incidents and direct *Executive Management Team* staff to take specific action or revise policies or processes in light of incidents discovered.

The *Corporate Governance Board* will delegate certain responsibilities to other positions and bodies within SI. Refer to the *Corporate Governance Policy* and *Delegations of Authority Policy*.

All staff are expected to:

- Abide by general professional and ethical standards
- Understand the policies and procedures surrounding fraud and corruption
- Take all reasonable steps to prevent fraud and corruption, such as declaring conflicts of interest
- Report instances of fraud and corruption in good faith.

Prevention and mitigation

Key to preventing and minimising the risk of fraud and corruption is a suite of general measures as outlined below:

- Effective risk management processes as per the *Risk Management Policy* and *Business Continuity Plan*
- Ensuring that all those involved in operations at SI are fully informed of their rights and responsibilities through codes of conduct, induction, orientation, and ongoing training and information sessions.
- Maintaining an incident database in which all instances of fraud or corruption are recorded, monitored, and referred to in developing changes to policies and procedures
- Maintaining ongoing internal reporting and auditing processes
- Undertaking regular independent audits of SI finances by a qualified Auditor.

Furthermore, SI has identified the following high-risk areas for fraud and corruption and corresponding measures to prevent and minimise the risk of incidents.

Governance

SI has delegations and reporting system which ensures appropriate oversight and reporting to upper management and the *Corporate Governance Board* with regard to financial decision making.

SI will ensure that conflicts of interest in governance matters are swiftly and appropriately resolved, as per the *Conflict of Interest Policy*.

Accounting, payroll, and procurement

In addition to the governance arrangements described above, SI will maintain sound financial

management processes as per the *Financial Management Policy*.

Legal and regulatory non-compliance

SI will monitor laws and regulations and ensure that SI policies and procedures are compliant, as outlined in the *Compliance Framework Policy*.

Recruitment

SI will ensure that recruitment processes are impartial and based on merit as per the *Workforce Policy*.

Staff training

Training, support, and professional development will be offered to all staff members. Those involved in financial decision-making will be provided with specific financial management training and support.

Delegation of authority

A framework of delegations of authority will be implemented within SI to ensure that staff members with the appropriate seniority handle decision-making. See *Delegation of Authority Policy* and *Delegations Register* for more information.

Academic misconduct

As per the *Misconduct Policy*, SI will implement policies and procedures to prevent and address instances of academic misconduct. In addition to this, the *Intellectual Property Policy* and *Copyright Policy* establish clear procedures to safeguard against breach of intellectual property and copyright law infringements.

Student admissions and records

SI has established a suite of policies to safeguard against fraud and corruption in student admissions and records, including the *Falsification of Documentation Policy*, *Degree Issuance and Replacement Policy*, *Admissions Policy*, and *Data and Records Integrity Policy*.

Identification

Identification through monitoring activities

Fraud and corruption may be identified during the *Corporate Governance Board* review of reports from SI departments, or by the independent Auditor. In these cases, the *Corporate Governance Board* will instigate an investigation driven either by a senior staff member or someone independent of SI.

Reporting

All members of SI community are expected to report any instances of fraud or corruption or suspicious circumstances that may indicate an instance of fraud or corruption. Staff may be held liable if they do not report an incident that they have witnessed.

Reports should be made to internal or external Auditor, a member of the *Audit and Risk Committee* or *Executive Management Team*. Reports may be submitted via three means:

1. Email
2. Face-to-face meeting with an *Executive Management Team* member
3. Externally to the Australian Securities and Investment Commission (<http://www.asic.gov.au/report-misconduct>).

Whistle-blower protection

Any member of the SI community who reports acts of fraud and corruption will be afforded the following rights:

- Their identity will be kept completely confidential
- SI will continue to treat them as employees equal to all other employees
- They will not be subjected to any kind of reprisal in response to their report by SI.
- SI will, to the best of its ability, protect them from reprisal by others.

Response

Anyone accused of fraud or corruption will be treated with the principles of natural justice and will thus have the opportunity to present their case to a committee.

Disciplinary measures may include:

- Suspension
- Expulsion or termination of contract
- For more serious offences, the incident may be handled by law enforcement authorities

In the event that an incident must be reported to the police or regulatory bodies, SI will cooperate fully and provide the documents required for their investigation.

SI will seek legal advice for any attempt to recover losses incurred in due to fraud or corruption.

Once the incident is resolved, a report summarising the proceedings will be finalised, added to the incident database, and circulated to the relevant stakeholders. Based on the report of events, the *Audit and Risk Committee* will investigate SI policies and procedures and recommend changes to the *Corporate Governance Board* to address any issues or loopholes.

Policy Implementation and Monitoring

The *Corporate Governance Board* delegates responsibility for the day-to-day implementation of this policy to the *Audit and Risk Committee*.

The *Corporate Governance Board* will review all periodic reports from relevant committees and staff members, in accordance with the *Compliance Calendar*.

Additionally, the *Corporate Governance Board* will review all relevant student complaints, concerns raised by staff members, and instances of student or staff misconduct on an ongoing basis.

Based on these monitoring activities, the *Corporate Governance Board* must ensure that findings are taken into account in planning, quality assurance and improvement processes.

Definitions

Corporate governance: The framework of structures, rules, relationships, systems and processes through which authority is delegated, accountability is maintained, the directions and targets of the higher education provider are determined and implemented, performance is monitored, risks are identified and managed, and corporate culture is developed.

Corporate Governance Board: the governing body responsible for oversight of all higher education operations, including the ongoing viability of the institution and the quality of its higher education delivery. The *Corporate Governance Board* guides management and delegates responsibility for academic matters to the *Academic Board*.

Corruption: A dishonest act contrary to the interests of SI and which abuses a position of power or inside information.

Delegations Register: A schedule that defines the amounts, duties and responsibilities for transactions and to who authority has been delegated by the *Corporate Governance Board*.

Fraud: A dishonest act in which an individual or individuals obtain material benefit by deceptive means.

SI Community: Consists of staff, students and other stakeholders of SI.

Review schedule

This policy will be reviewed by the *Corporate Governance Board* every three years.

Version History				
Version number:	Approved by:	Approval date:	Revision notes:	Next review date:
1	Corporate Governance Board	13/11/2017		13/11/2020
2	Corporate Governance Board	06/01/2021	No change. Periodic Review.	06/01/2024

▲ Related Documents

🔗	Academic and Professional Integrity Policy
🔗	Admissions Policy
🔗	Anti-Fraud and Corruption Policy
🔗	Compliance Framework Policy
🔗	Conflict of Interest Policy
🔗	Copyright Policy
🔗	Corporate Governance Policy

Data and Records Integrity Policy
Degree Issuance and Replacement Policy
Delegation of Authority Policy
Falsification of Documentation Policy
Financial Management Policy
Intellectual Property Policy
Misconduct Policy
Risk Management Policy
Workforce Policy
Business Continuity Plan
Constitution
Delegations Register
Audit and Risk Committee - Terms of Reference
Corporate Governance Board - Terms of Reference

End of document: "Anti-Fraud and Corruption Policy"

Document ID: 8486, Revision No : (10), Created : January 5, 2020 6:17 pm, By : Nigel Finch, Last updated : January 20, 2021 4:02 pm, Updated by : Nigel Finch, Next Review by : Nigel, Review Scheduled For : January 6, 2024

Produced & Printed : Wednesday 20th of January 2021 05:02:51 AM "Sydney Institute of Higher Education ABN 49 618 742 813 TEQSA PRV14323 CRICOS 03866C"