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| RESPONSIBLE MANAGER: | Audit, Risk and Compliance Committee |
| CATEGORY: | Institute Governance |
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| RELATED DOCUMENTS: | AS 8001-2008 Fraud and Corruption Control Protected Disclosure Act 2012 PPP172 Fraud and Corruption Control Guidelines PPP010 Protected Disclosure Policy and Procedure FIN-012 Fraud Corruption Incident Report |

Purpose

This policy outlines South West TAFE's commitment to the highest standards of legal, ethical and moral behaviour, and to establishing an organisational culture that will prevent fraud and corruption.

The Australian Standard on Corporate Governance – Fraud and Corruption Control (AS8001:2008) sets a basis for best practice for fraud and corruption management.

Scope

This policy applies to all staff of South West TAFE at all campuses of the organisation and to all activities under the control of South West TAFE.

Definitions

For the purposes of the Fraud and Corruption Control policy, the definitions below apply.

- “*Corruption*” is defined in AS 8001-2008 as being a 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 concept of ‘corruption’ within this standard can also involve corrupt conduct by the entity, or a person purporting to act on behalf of and in the interests of the entity, in order to secure some form of improper advantage for the entity either directly or indirectly.
- “*Fraud*” is defined in AS 8001-2008 as being a 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 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.

Objectives

The objectives of this policy are to:

- Ensure senior management's commitment for its responsibility for identifying risk exposures to corrupt and fraudulent activities and for establishing controls and procedures for prevention and detection of such activities.
- Reinforce the requirement for all staff and others to refrain from corrupt conduct, fraudulent activities, and maladministration and encourage the reporting of any instance of fraud, corrupt conduct or maladministration.
- Ensure that all staff and others are aware of their responsibilities in relation to the ethical conduct of themselves and their staff (if any).
- Ensure that regular assessment of the risks of corruption and fraud are undertaken, and all suspected corrupt and fraudulent activity are dealt with appropriately.
- Protect South West TAFE's assets, interests and reputation.

The CEO and Executive Managers are responsible for the implementation of this policy through an appropriate fraud and corruption control plan and an effective internal control structure

Responsibility

Successful implementation of the Fraud and Corruption Control policy requires recognition and incorporation of the following elements:

- *Corporate governance, fraud and corruption control*

The South West TAFE Board, through this policy and other associated guidelines will ensure that key risk exposure areas are identified and that procedures are in place for management to control and monitor these areas in order to prevent fraud and corruption. The Board will ensure that South West Institute of TAFE complies with the Australian Standard on Fraud and Corruption Control (AS8001 – 2008).

- *Executive and management commitment*

The CEO, Executive Managers and Department Managers must be committed to the active prevention of fraudulent or corrupt activities in a systematic way in order to enhance the operation and reputation of the Institute.

All senior managers must ensure there are mechanisms in place within their area of control to:

- identify and assess the risk of fraud, corruption and theft
- encourage a culture of honest and ethical behaviour, and
- educate employees about fraud and corruption prevention and detection.

Senior managers are expected to bring to the notice of the Audit, Risk & Compliance Committee any potential areas of fraud and corrupt activities as required, and enforce or develop procedures to control and monitor these areas. An annual report will be provided to the Board.

- *Reporting and Monitoring*

The Audit, Risk & Compliance Committee is delegated responsibility for monitoring fraud control and prevention and shall report to the Board at least annually.

The Audit, Risk & Compliance Committee will ensure that internal and external auditors conduct bi-annual reviews of fraud prevention systems and controls and that this is reported to the Audit, Risk & Compliance Committee.

- *Fraud and Corruption Management Process*

All staff have the responsibility to report suspected fraud, corruption or serious misconduct. Any staff member who suspects such activity should notify his/her line manager or have the matter dealt with under the provisions of the South West Institute of TAFE Protected Disclosure Policy and Guidelines.

On receiving a report of suspected fraud, corruption or serious misconduct the line manager must record the details of the report, including the time and date the report is made and details of matters raised.

All reported incidents of suspected fraud, corruption or serious misconduct must be reported to the Executive Manager, Corporate Services immediately (where the allegation of fraud or corrupt conduct is against the Executive Manager, Corporate Services the incident must be reported to the CEO).

Alternatively staff members can report suspected corruption, theft and/or fraudulent activity directly to the following external authorities:

Victorian Ombudsman

Web Link: [Make a complaint](#)
Phone: 1800 806 314
Address: Victorian Ombudsman
Level 2
570 Bourke Street
Melbourne VIC 3000

Independent Broad-based Anti-corruption Commission (IBAC)

Web Link: [Make a complaint](#)
Phone: 1300 735 135
Fax: (03) 8635 6444
Address: Level 1, North Tower,
459 Collins Street
Melbourne, VIC 3000

GPO Box 24234,
Melbourne VIC 3001

Staff development and training

The Workforce Development Plan identifies the ongoing staff development program aimed at building staff capability around principles and actions of ethical behaviour.