

Fraud and Corruption Management Policy

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1. Purpose

The purpose of this policy is to:

- a. uphold the values of Flinders University to maintain the highest professional and ethical standards and act in the best interests of the University and uphold its reputation
- b. set out the expectations of the University and the obligations of members of its community to not engage in fraud or corruption
- c. provide direction regarding the appropriate avenues to report any suspected instances of fraud or corruption
- d. set out the roles and responsibilities for identifying, assessing, managing and monitoring fraud and corruption risks.

2. Scope

- a. This policy applies to all members of the University community when engaged in University business.
- b. This policy does not apply to alleged student misconduct, which is managed in accordance with Statute 6.4: Student Conduct, the [Handling a Matter under Statute 6.4: Student Conduct policy and procedures](#), and the [Student Academic Integrity Policy](#).
- c. The [Research Integrity Policy](#) applies to breaches of research integrity, however this policy may also apply to the extent that fraud or corruption is involved.

3. Definitions

Fraud	dishonest or deceptive activity causing actual or potential gain or loss to any person or entity, including the theft of money or other property (including intellectual property), by members of the University community or persons external to the University. Fraud also includes the deliberate falsification, concealment, or destruction of documentation used in a business process for personal benefit.
Corruption	any activity in which a member of the University community acts contrary to the interests of the University and breaches their position of public trust and/or abuses their office as a public official to achieve personal advantage or advantage for

	<p>another person or entity, or to avoid a detriment (note: all University employees, officers and contractors are public officers <i>under the Independent Commissioner Against Corruption Act 2012 (SA)</i>).</p> <p>Corruption also includes, but is not limited to, an individual carrying out their duties dishonestly, unfairly or misusing University and/or public resources or information for an improper purpose, including but not limited, by way of bribery, abuse of trust or threats.</p> <p>For the purposes of this policy, corruption also includes bribery and foreign bribery.</p>
Bribery	means offering, giving, receiving or soliciting any item of value with the intention of gaining a benefit when that benefit is not legitimately due or with the intention to influence, gain or retain business or business or personal advantage, either directly or via an associate or agent.
Foreign bribery	the act of providing, offering, or promising a benefit to a foreign public official with the intention of improperly influencing them to obtain or retain business or a business or personal advantage. Bribing, or attempting to bribe, a foreign public official is a serious crime under the <i>Crimes Legislation Amendment (Combating Foreign Bribery) Act 2024 (Cth)</i> .
University community	<p>For the purposes of this policy, University community includes, to the extent they are involved in University business:</p> <ul style="list-style-type: none"> • employees and exchange staff • employees of controlled entities, Centres and Institutes, and affiliated clubs and associations • contractors and consultants performing work on University sites or on behalf of the University • visiting academics or persons with academic status • members of the Council and its committees • any volunteer in the workplace and study environment.

4. Policy statement

4.1. Key principles

- a. Flinders University is committed to preventing fraud and corruption within the University and its controlled entities.
- b. The University considers fraud and corruption a serious matter and maintains zero tolerance towards fraud and corruption, requiring any case of suspected fraud or corruption to be reported immediately and dealt with appropriately.
- c. The University adopts a risk-based approach, consistent with its [Risk Management Policy](#), to identify fraud and corruption risks and put in place appropriate control strategies.

4.2. University expectations

All members of the University community are expected to:

- a. act honestly and exercise skill, care and diligence in the performance of their duties
- b. in line with the University's [Code of Conduct](#), use the University's funds, property and other resources responsibly and for the benefit of the University
- c. carry out financial matters with integrity and in accordance with the [Finance Policy](#)
- d. actively assess their circumstances, interests and relationships and declare any conflicts of interests to their manager /supervisor as specified in the [Conflict of Interest Policy](#)
- e. not engage in fraud or corruption (including never soliciting, offering or providing a bribe or foreign bribe) and comply with all applicable laws
- f. report, at the earliest possible opportunity, any suspected instances of fraud or corruption.

4.3. Reporting

- a. A member of the University community who becomes aware of suspected fraud or corruption must report it to the General Counsel and University Secretary and Chief Financial Officer.
- b. If these processes are not suitable, or the individual reporting the suspected fraud or corruption considers it to be of high importance and/or sensitive in nature, and/or they wish to eligible for statutory protections under the *Public Disclosure Act 2018 (SA)*, a report may be made under the [Public Interest Disclosure Policy](#) and [procedures](#).

4.4. Investigation

- a. Upon receiving a report, the General Counsel and University Secretary and Chief Financial Officer will conduct a preliminary assessment to ascertain whether the issues raised warrant further investigation or need to be addressed in accordance with the [Public Interest Disclosure Policy](#) and [procedures](#).
- b. The General Counsel and University Secretary will maintain a register of all reported incidents of fraud and corruption.

5. Responsibilities

Council, supported by the Audit and Risk Committee	a. Oversight and monitoring of the assessment and management of fraud and corruption risks across the University.
Chief Financial Officer	<ol style="list-style-type: none"> b. Evaluate and assess financial fraud risks, controls and their effectiveness to determine appropriate actions, including risk acceptance or treatment plans. c. Monitor the financial fraud risks and treatment plans and maintain a current financial fraud risk profile. d. Report instances of actual or suspected financial fraud and corruption to relevant external authorities where required under relevant legislation or accounting standards.
General Counsel and University Secretary	e. Provide advice and guidance on non-financial fraud and corruption risks, controls and their effectiveness.

	<p>f. Monitor non-financial fraud and corruption risks and treatment plans and maintain a current risk profile.</p> <p>g. Provide advice and guidance on reporting obligations under relevant legislation.</p> <p>h. Report to the Audit and Risk Committee on the identification and management of fraud and corruption risks, as required, in line with the Audit and Risk Committee's Terms of Reference.</p>
Vice-President and Executive Deans / Portfolio Heads	<p>i. Ensure that fraud and corruption risks are identified, assessed, managed and reviewed in accordance with the Risk Management Policy within their areas of responsibility.</p>
Managers / supervisors	<p>j. Publicise the requirements of this policy amongst staff.</p> <p>k. Be alert to and manage fraud and corruption risks within their area of responsibility.</p>
All members of the University community	<p>l. Ensure they are aware of and comply with the requirements of this policy.</p> <p>m. Report any suspected fraud or corruption, including bribery and foreign bribery, at the earliest possible opportunity.</p>

6. Breaches of this policy

Failure to comply with this policy may amount to misconduct and disciplinary action may apply, up to and including termination of employment or contract.

Approval Authority	General Counsel and University Secretary
Responsible Officer	Associate Director, Risk and Assurance
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* Unless otherwise indicated, this policy or procedures still apply beyond the review date.

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