



Fraud and Corruption Control Policy and Procedure

1. Purpose

The purpose of the Fraud and Corruption Control Policy is to establish a EIA committee to prevent fraud and mismanagement through effective risk management approaches. EIA recognises that preventing fraud and mismanagement is an integral part of good governance and management practice and is consistent with EIA's policies and procedures.

The objectives of this policy are to ensure EIA:

- develops and maintains an organisational culture of honesty and integrity;
- prevent fraud and corruption through systematic processes;
- detection and management of fraud and corruption;
- encourage, support and protect personnel who report suspected fraud and corruption.

This policy complies with the Higher Education Standards Framework (Threshold Standards) HES 2015 in the Tertiary Education Quality and Standards Agency Act 2011 by the Commonwealth of Australia, specifically to Standard 6.2.

2. Scope

This policy applies to staff and students at EIA.

3. Responsibility

The Finance Manager/Executive Manager of Operations is responsible for monitoring the implementation of this policy and is held accountable to the General Manager. Responsibilities of the Finance Manager/Executive Manager of Operations include notifying the General Manager immediately of fraudulent or corrupted acts and to provide progressive reports on the situation and outcome.

4. Definitions

Corruption: is an abuse of power and trust in order to gain personal advantage. It is a deliberate attempt to change, steal, disguise, conceal, bribe, lie and breach a corporate legal duty of care for others and the organisation's documentation.

Fraud: entails dishonest behaviour resulting in financial loss. It is a deliberate deception to give false information, by secretly hiding wrongdoings, or by damaging or destroying documentation and remaining silent and complying with others fraudulent behaviour.

5. Requirements

5.1 EIA has a zero-tolerance stance on fraud and corruption and is committed to minimising

the risks of such behaviour and ensuring continuing organisational integrity and transparency in all EIA activities consistent with its Codes of Conduct.

- 5.2 EIA will deter fraud and corruption by monitoring, reviewing and ensuring fraud and corruption with internal controls within the work environment and effective awareness of knowledge of such behaviour to all staff and students at EIA.
- 5.3 EIA adopts a preventative approach through detection and response to fraud and corruption.
- 5.4 Confidential information regarding fraud or corruption will be managed discreetly and carefully.
- 5.5 EIA has zero tolerance towards fraud and corruption, and those found to be guilty of fraud or corruption will be dealt with under the Australian laws.
- 5.6 All EIA staff must be equipped with the knowledge of fraud and corruption in the work environment and how to deter from it.
- 5.7 EIA staff must not engage in, nor actively or passively support fraud or corruption.
- 5.8 EIA staff must immediately report suspected fraud or corruption under the procedures of this Policy and be willing to co-operate during investigations.
- 5.9 EIA staff who become aware of incidents of fraud or corruption must observe appropriate confidentiality and EIAs communications protocols.
- 5.10 Managers must monitor fraud and corruption deterrence strategies and report immediate issues before the situation escalates out of control.
- 5.11 The Finance Manager of EIA must establish appropriate mechanisms to prevent, detect and respond to fraud and corruption.
- 5.12 Any failure by EIA staff to comply with this Policy may result in disciplinary action, the termination of consultancy agreements or other contracts and the referral to regulatory or law enforcement agencies.
- 5.13 EIA identifies the following high-risk areas of potential fraud or corruption that need effective prevention and detection measures to be in place:
 - Acquiring goods and services;
 - Human Resources and employment;
 - Corporate projects, workplace management and overall services;
 - Information technology systems, data, contracting services and supplies;
 - Financial exchanges in Australia or internationally;
 - Intellectual property & confidential information;
 - Payroll system and services;
 - Student admissions and records;
 - Education services for overseas students;
 - Management of external suppliers and service providers (where applicable).

6 Procedures

6.1 Fraud and corruption prevention

- 6.1.1 EIA will implement a control plan to deter and prevent fraud and corruption. This will be revised and updated regularly. The fraud and corruption control plan entails strategies and measurements for fraud and corruption control.
- 6.1.2 EIA will ensure that operational systems have appropriate internal controls in place designed to prevent fraud and corruption.
- 6.1.3 Those with managerial positions are expected to:
 - Pay attention to possible fraud or corruption by observing, monitoring and reporting risks within the EIA Fraud and Corruption Control Policy.

- Evaluate and assess possible fraud and corruption;
 - Definite fraud or corruption must be reported with on-going updates.
- 6.1.4 Managers of greater accountability must undertake internal reviews of their responsibilities regularly. New changes in responsibilities or risk levels must be reported immediately.
- 6.1.5 Fraud and corruption training must be undertaken by all new staff and on-going training for existing staff. Current and relevant information about fraud and corruption control must be included in EIAs employee induction program.
- 6.1.6 EIA will establish fraud and corruption prevention through its HSEG (EIA Australia office) Financial Management Policies and relating procedures, authority limits and transaction level procedures.
- 6.2 Fraud and corruption detection
- 6.2.1 Suspected fraudulent or corrupt behaviour must be reported to the Finance Manager, or to a department manager/ coordinator (as appropriate).
- 6.2.2 A report can be made orally or in writing and should clearly explain the basis for the suspicion of fraud or corruption.
- 6.2.3 EIA will ensure protection for those reporting suspected instances of fraud and corruption. EIA will also ensure that natural justice will be applied to individual complaints.
- 6.2.4 EIA will assess all allegations of fraud or corruption. Where there is a reasonable suspicion that corrupt conduct may have occurred; the Finance Manager will be notified prior to any investigation commencing.
- 6.2.5 All EIA staff involved in or aware of an investigation into possible fraud or corrupt conduct case, must keep details and results strictly confidential.
- 6.3 Fraud and corruption response
- 6.3.1 If the matter required the appointment of the investigation team, the Finance Manager must appoint the investigation team, which includes the following positions: Financial officer and Human Resource Manager.
- 6.3.2 The investigation team will appoint an Investigation Officer to conduct the investigation with the following steps:
- Analysing and evaluating fraud and corruption;
 - Assigning and deleting responsibilities to the investigative team;
 - Commencing a thorough investigation into the circumstances and perpetrators;
 - Finding evidence and selecting appropriate proof of fraud and corruption;
 - Finalising the investigation.
- 6.3.3 The Investigations Officer must provide a report of recommendations immediately to the Investigation Team. Where recommendations will involve a detailed investigation, the Investigations Officer will provide on-going reports to the Investigation Team. The Investigation Team will review the outcomes and recommendations made by the Investigations Officer and commence appropriate action.
- 6.3.4 The Investigation Team will determine and report to the Finance Manager about the appropriate course of action which may include:
- Referral to external agencies;

- Disciplinary action under the employment contract; and
- Recover of money, assets or property plan.

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