



# FRAUD AND CORRUPTION PREVENTION POLICY

## **RATIONALE:**

This policy covers the prevention, detection and management of fraud and corruption.

It aims to raise the awareness of fraud and its prevention in the College environment, including strategies and procedures that address the issue of accountability, efficient and effective administration that focus on improving systems and procedures, changing the attitudes of staff and improving the overall integrity and performance of the College. It aims to give guidance to both the reporting of suspected fraud and for fair dealing of the investigation of such reported fraud or corruption.

## **AIMS:**

- To ensure that Principal Class Officers are aware of their responsibilities for identifying exposures to fraudulent and corrupt activities and for establishing controls and procedures for preventing such activity and/or detecting such activity when it occurs;
- To ensure schools report all instances of actual or suspected fraud
- To provide guidance to all staff on action to be taken where they suspect any fraudulent or corrupt activity;
- To provide a clear statement to staff forbidding any illegal activity, including fraudulent or corrupt activity;
- To provide assurance that all suspected fraudulent and corrupt activity will be fully investigated;
- To provide guidance as to responsibilities for conducting investigations into such activities;
- To provide a suitable environment for staff to report matters that they suspect may involve fraudulent or corrupt activity, or serious improper conduct; and
- To provide adequate protection to staff in circumstances where they are victimised as a consequence of reporting, investigating or being a witness to, these activities.

## **DEFINITION:**

### **Fraud**

Fraud is defined as dishonest activity causing actual or potential financial loss to the Department (including thefts of monies or other property) and where deception is used at the time, immediately before or immediately following the activity.

This also includes deliberate falsification, concealment, destruction or use of (or intention to use) falsified documentation and the improper use of information or position for personal financial benefit.

### **Corruption**

Corruption is a dishonest activity in which an executive, manager, employee or contractor of the Department acts contrary to the interests of the Department 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.

Fraud and corruption can be perpetrated against the department by:

- a Department employee

- an agency or external individual
- a contractor or service provider
- any combination of the above, acting in collusion or otherwise.

## **IMPLEMENTATION:**

**The Principal is responsible for the prevention, detection and investigation of fraud and corrupt activities and is also responsible for ensuring that appropriate and effective internal control systems are in place.**

It is the responsibility of all Assistant Principals, Leading Teachers, Budget Leaders, Business Managers, and Library and IT Technicians to ensure that there are mechanisms in place within their area of control to:

- Assess the risk of fraudulent and corrupt activities;
- To promote staff awareness of ethical principles, honest dealings, understandings as to the role all play as custodians of this educational facility and all its assets and reputation;
- Educate staff about fraud and corruption prevention and detection, to this end
  - Ensure that staff understand that internal controls are designed and intended to prevent and detect fraudulent and corrupt activities;
  - Encourage staff to report suspected fraud directly to those responsible for investigation without fear of disclosure or retribution; and
  - Require all staff to follow the systems and procedures established by the College, that will be reviewed from time to time, along with College Policy, and that of the Department of Education;
  - The Principal, through the Delegation Order, delegates responsibility to designated Staff for specific areas such as budget management and custodianship of assets.

In addition, all Staff share responsibility for the prevention and detection of fraud and corruption, and for the implementation of this Policy.

### **Protected Disclosure**

Any employee who wishes to make a protected disclosure about the Department or any of its employees and/or officers should contact or report to:

- the Department's Protected Disclosure Coordinator  
Mr. Jonathan Kaplan  
Telephone 96313650 or  
email [kaplan.jonathan.e@edumail.vic.gov.au](mailto:kaplan.jonathan.e@edumail.vic.gov.au)

or

- Notify the Manager, Fraud and Corruption Control (03) 7022 0121 or email  
[hurrell.ashley.k@edumail.vic.gov.au](mailto:hurrell.ashley.k@edumail.vic.gov.au)

or

- the Independent Broad-based Anti-corruption Commission (IBAC)  
Level 1, North Tower  
459 Collins Street  
Melbourne Vic 3000  
Postal address: GPO Box 24234, Melbourne VIC 3001

Telephone: 1300 735 135  
Website: www.ibac.vic.gov.au

The College will comply with the Department of Education Audit Policy for the conducting of an annual audit of financial management to ensure that appropriate and effective internal control systems are in place and act on any recommendations from such audit.

**RELATED LEGISLATION:**

- Financial Management Act 1994
- Standing Directions of the Minister for Finance under Financial Management Act
- Protected Disclosure Act 2012

The College will comply with the Department of Education Accountability requirements.

**DET RESOURCES:**

- Fraud and Corruption Control Framework  
<https://edugate.eduweb.vic.gov.au/Services/Policies/Pages/Fraud.aspx>
- Fraud and Corruption Control Policy and Procedures  
<https://edugate.eduweb.vic.gov.au/Services/Policies/Documents/Frud%20and%20Corruption%20Control%20Policy%20and%20procedures.pdf>
- Making and handling protected disclosures  
<https://edugate.eduweb.vic.gov.au/Services/Policies/Documents/Making%20and%20Handlin%20Protected%20Disclosures%20-%20Guidelines.pdf>

**EVALUATION:**

This policy will be reviewed annually by the Finance Sub-Committee for endorsement by College Council.

*RATIFIED BY COLLEGE COUNCIL*

\_\_\_\_\_ Date: \_\_\_/\_\_\_/\_\_\_  
*College Council President*

*Review Date September 2020*