

OFFICIAL

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RELATED DOCUMENTS:	AS 8001-2008 Fraud and Corruption Control Public Interest Disclosure Act 2012 PPP172 Fraud, Corruption and Other Losses Guidelines PPP010 Public Interest Disclosure Guidelines FIN012 Fraud Corruption Incident Report ARC002a Speak Up Process Map 2023 ARC002b How to Use SPEAK UP FAQ Speak Up ECHO page

1. Purpose

This policy outlines South West TAFE's (SWTAFE or the 'Organisation'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.

2. Scope

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

3. Definitions

For the purposes of the Fraud, Corruption and Other Losses 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.

4. 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

5. Responsibility

Successful implementation of the Fraud, Corruption and Other Losses Policy requires recognition and incorporation of the following elements:

- *Corporate governance, fraud and corruption control*

The Board will lead the culture of fraud, corruption and other losses prevention and ensure that appropriate policies, systems and accountabilities are in place to maintain the strong integrity of SWTAFE.

- *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 SWTAFE

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 Audit, Risk & Compliance Committee.

- *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 regular 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 Public Interest 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).

Speak UP

Speak Up is an independent external service that allows SWTAFE employees to raise concerns of suspected fraud, corruption and serious misconduct, including the option to remain anonymous. The Speak Up Program supports the organization in providing alternative reporting channels for staff when reporting fraud, corruption and serious misconduct.

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
Address: Level 1, North Tower,
459 Collins Street
Melbourne, VIC 3000
GPO Box 24234,
Melbourne VIC 3001

6. 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