

## Fraud and Corruption Prevention and Control Workplan –2023 - 2026

### 1. Commitment to fraud and corruption control

This Fraud and Corruption Prevention and Control Workplan ('Workplan') represents the University's commitment to effective fraud risk management and prevention. The desired outcome of this commitment is to minimise the potential for fraud against the University, whether by staff or persons external to the University. The Workplan aims to draw together the University's fraud prevention and detection initiatives into one document and forms part of the University's fraud and corruption control system that has three major components:

- **Prevention** – initiatives to deter and minimise the opportunities for fraud or corruption
- **Detection** – initiatives to detect fraud or corruption as soon as possible after it occurs, and
- **Response** – initiatives to deal with detected or suspected fraud or corruption, set out in the procedures part of the Fraud and Corruption Prevention and Control Policy.

### 2. Definition of fraud and corruption

The University has adopted the following definition of fraud:

*"Dishonest activity causing actual or potential gain or loss to any person or organisation including theft of monies or other property by persons internal and/or external to the organisation and/or where deception is used at the time, immediately before or immediately following the activity."*

Fraud can be perpetrated by members of the University Community (internal fraud) or by persons external to the University (external fraud), or by a combination of both. It can involve financial and non-financial incidents that have an impact upon the operations and the reputation of the University.

The University has adopted the following definition of corruption:

*"Dishonest activity in which a person associated with an organisation (e.g., director, executive, manager, staff member, titleholder, or contractor) acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of and in the interest of the organisation, in order to secure some form of improper advantage for the organisation either directly or indirectly."*

The University has zero appetite for fraudulent activities and corruption.

### 3. Other areas in the University dealing with fraud and corruption

The [IT Acceptable Use and Security Policy](#) describes the cyber security framework and highlights policy principles to prevent cyberattacks and other threats. This Workplan will not cover the plan in preventing, detecting and responding to external attack but refers to the cyber security framework maintained by ITDS.

Fraudulent acts by students which could be considered Academic Misconduct are set out in the [Academic Integrity Policy](#). Allegations of misconduct by a student are dealt with under the [Student Misconduct Policy](#) and Chapter 3 of the University of Adelaide [Statutes](#). This Workplan will not focus on fraudulent acts by students but refers to the relevant area instead.

The University's values and behavioural expectations for staff are set out in the [Code of Conduct](#). The University aims to encourage a working environment of integrity, collegiality and respect, that supports excellence and discovery through appropriate behaviour and conduct and through compliance with relevant legislation, as set out in the [Behaviour and Conduct Policy](#). The policy also sets out the associated procedures related to conflict of interest and will therefore not be covered in detail in this Workplan.

## PREVENTION

Action	Timeline	Person / Area Responsible
<p><b>Integrity Framework – Code of Conduct</b></p> <p>A fundamental strategy in controlling the risk of fraud and corruption is the development and maintenance of a sound ethical culture, underpinned by effective and continuous communication, example-setting by management, and risk management.</p> <p>The University's Integrity Framework is underpinned by the Behaviour and Conduct Policy and related procedures, as well as the Code of Conduct which are developed and administered by Human Resources. This includes the Conflict of Interest Procedure as a means to ensure effectively identifying and disclosing actual, potential or perceived conflicts of interest across the University, so that a management plan can be implemented to minimise risk where such conflicts are problematic. Behavioural expectations are set out in the Staff Values and Behaviours Framework which outlines in more detail the University's principles around maintaining a high level of integrity and the associated procedures describe the processes in place with regard to the application.</p> <p>In accordance with the Code of Conduct, staff are expected to report inappropriate behaviour to ensure that the University can identify and address behaviour that does not align to the University's values. The University's Integrity Unit provides centralised oversight and management of these concerns. The University also actively promotes the legislated obligation for Public Officers to report certain matters to external bodies, in accordance with the <i>Independent Commission Against Corruption Act 2012</i>.</p> <p>Human Resources and the Integrity Unit partner to ensure the accurate reporting of matters is provided to the University's People and Culture Committee. The Integrity Unit is responsible for identifying and ensuring the ongoing promotion of integrity policies and the behavioural expectations under the Code of Conduct through the development and delivery annually of Integrity and Ethics Training.</p>	Continuous	Human Resources, Integrity Unit
<b>Fraud and corruption control planning</b>		
To maintain effective practice in its fraud risk management practices, the University will:		
<ul style="list-style-type: none"> <li>Ensure there is regular communication to all staff promoting compliance with the Fraud and Corruption Prevention and Control Workplan and adherence to the Fraud and Corruption Prevention and Control Policy;</li> </ul>	Minimum yearly communication	Chief Risk Officer, Chief Operating Officer, Vice-Chancellor and President,
<ul style="list-style-type: none"> <li>Review the Fraud and Corruption Prevention and Control Workplan concurrently with the policy review to ensure that it remains up-to-date and considers changes in the</li> </ul>	Aligned to the Policy review cycle	Risk Services

## PREVENTION

Action	Timeline	Person / Area Responsible
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University's operations, environment and significant risk areas.

### Staff induction and training

All new staff appointed by the University are required to complete the online Fraud and Corruption Control Induction course. Training related to Working with Integrity and Conflict of Interest are also part of the induction courses.

The University will:

- |   |   |                                |
|---|---|--------------------------------|
| • Provide an online Fraud and Corruption Prevention and Control Induction course  | Ongoing   | Human Resources                |
| • Monitor completion of the Fraud and Corruption Prevention and Control Induction course for all staff including new starters and follow-up completion rates with Human Resources and Supervisors   | Quarterly   | Risk Services, Human Resources |
| • Review the Fraud and Corruption Prevention and Control Induction course concurrently with the policy review to ensure it remains up-to-date and considers changes in the University's operations, environment, and significant risk areas | Within the year following the update to the Policy review cycle | Risk Services                  |
| • Monitor completion of the Fraud and Corruption Prevention and Control Induction course by all staff after an update has been rolled out.  | Aligned to the Policy review cycle                              | Risk Services                  |

### Fraud awareness training

Generally, a significant proportion of fraud or corruption goes undetected because of the inability to recognise the early warning signs of fraudulent activity or because staff are unsure how, when, or to whom they should report their suspicions. Fraud and corruption awareness training assists in raising the general level of awareness amongst staff by:

- The University Fraud and Corruption Prevention and Control Policy and Workplan
- What might constitute fraud or corruption
- The University's "zero appetite" approach towards fraud and corruption
- The ways in which they can report allegations or concerns regarding fraud, corruption, or unethical conduct

The University will:

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|---|------------------------------|----------------------------------|
| • Periodically conduct fraud and corruption awareness training sessions | Minimum one session per year | Risk Services, Integrity Unit or |
|---|------------------------------|----------------------------------|

## PREVENTION

Action	Timeline	Person / Area Responsible
<ul style="list-style-type: none"> <li>Actively participate in fraud and corruption awareness training sessions</li> </ul>	As and when	outsourced All staff

### Fraud and corruption risk assessment

The Fraud and Corruption Prevention and Control Policy identifies areas considered to be of higher risk that may warrant review. To maximise the effectiveness of the fraud or corruption risk assessment process, the assessment should:

- Be completed by a prioritised sample of functional areas on a rotational basis
- Include assessment at local levels by agreed self-assessment criteria
- Be relevant and comprehensive, covering as far as possible, all potential risks
- Comply with AS 8001:2021– Fraud and Corruption Control Standards
- Separately consider inherent risk and internal control risk

The University will:

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|---|--|---------------|
| <ul style="list-style-type: none"> <li>Complete yearly internal control and fraud risk self-assessment in areas that have been identified as high risk by Risk Services (and consider attestation requirements).</li> </ul> | Yearly                                     | Area Managers |
| <ul style="list-style-type: none"> <li>Periodically outsource detailed fraud and corruption risk assessments of high-risk areas</li> </ul>  | Minimum one fraud risk assessment per year | Risk Services |

### Internal control

Internal controls are the first line of defence against fraud and corruption. The University is committed to maintaining strong internal controls and promoting a robust internal control culture.

The University will:

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| <ul style="list-style-type: none"> <li>Design and implement an internal control and fraud self-assessment methodology and tool</li> </ul>                                     | By end of 2024 | Risk Services |
| <ul style="list-style-type: none"> <li>Complete yearly internal control and fraud self-assessment in areas that have been identified as high risk by Risk Services</li> </ul> | Yearly         | Area Managers |
| <ul style="list-style-type: none"> <li>Ensure all key internal controls are documented in standardised policies and procedures</li> </ul>                                     | Continuous     | Area Managers |

## DETECTION

Action	Timeline	Person / Area Responsible
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### Data analytics

Data analysis is a powerful means of detecting fraud and other improper behaviours. It is a process of uncovering patterns and relationships in datasets that on face value appear unrelated, highlighting activity of fraud and irregular behaviour, or to explain what lies behind previously identified discrepancies. This might include such tests as searching accounts payable data for repeated invoice numbers to identify duplicate payments or analysing payroll data for duplicate bank account numbers to uncover payroll fraud.

The University will:

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| <ul style="list-style-type: none"> <li>Complete periodic targeted anti-fraud data analytics review in areas with high inherent risk (e.g., payroll, account payable, procurement)</li> </ul> | One data analytics review per year | Finance |
|--|------------------------------------|---------|

### Management accounting reporting review

Using relatively straightforward techniques in analysing the University's management accounting reports, trends can be examined and investigated which may be indicative of fraudulent conduct. Some examples of the types of management accounting reports that can be utilised on a compare and contrast basis are:

- Financial reports comparing actual and budgeted results for each faculty and division
- Reports comparing expenditure against industry benchmarks
- Reports highlighting unusual trends in bad or doubtful debts

The University will:

- |   |            |         |
|---|------------|---------|
| <ul style="list-style-type: none"> <li>Adopt appropriate management accounting reporting reviews</li> </ul> | Continuous | Finance |
|---|------------|---------|

### Internal control review

Formal internal control reviews are conducted by both the Internal and External Audit. As a part of continual business improvements, internal controls are continually reviewed, and policies and procedures updated accordingly. The outputs of the fraud or corruption risk assessments may identify particular functions or activities that require review.

The University will:

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|--|------------|---------------|
| <ul style="list-style-type: none"> <li>Continually review internal controls, policies and procedures, and process updates</li> </ul> | Continuous | Area Managers |
|--|------------|---------------|

## DETECTION

Action	Timeline	Person / Area Responsible
<p>accordingly</p> <ul style="list-style-type: none"> <li>Make the results of the fraud and corruption risk assessments, internal control self-assessments and data analytics reviews available to internal and external audit so the results can be taken into account when developing their workplan</li> </ul>	Yearly	Risk Services, outsourced Internal Auditor, External Audit
<p><b>Whistleblower protection</b></p> <p>The University provides whistleblower protections in accordance with its Public Interest Disclosure Policy. This policy reflects the protections available under both state and federal laws, as well as protections made available to individuals in a broader range of circumstances by the University. The Public Interest Disclosure Policy ensure the University will recognise and respect the confidentiality of the identity of a bona fide informant and ensure support and protection are provided to an informant against any form of recrimination or reprisal or any threat of detriment.</p>	Continuous	Integrity Unit
<p><b>External audit</b></p> <p>The University recognises that the external audit function has a role to play in the detection of fraud given the responsibilities of auditors under ASA240 'The Auditors' Responsibility to Consider Fraud in an Audit of a Financial Report'.</p>	Continuous	External Audit