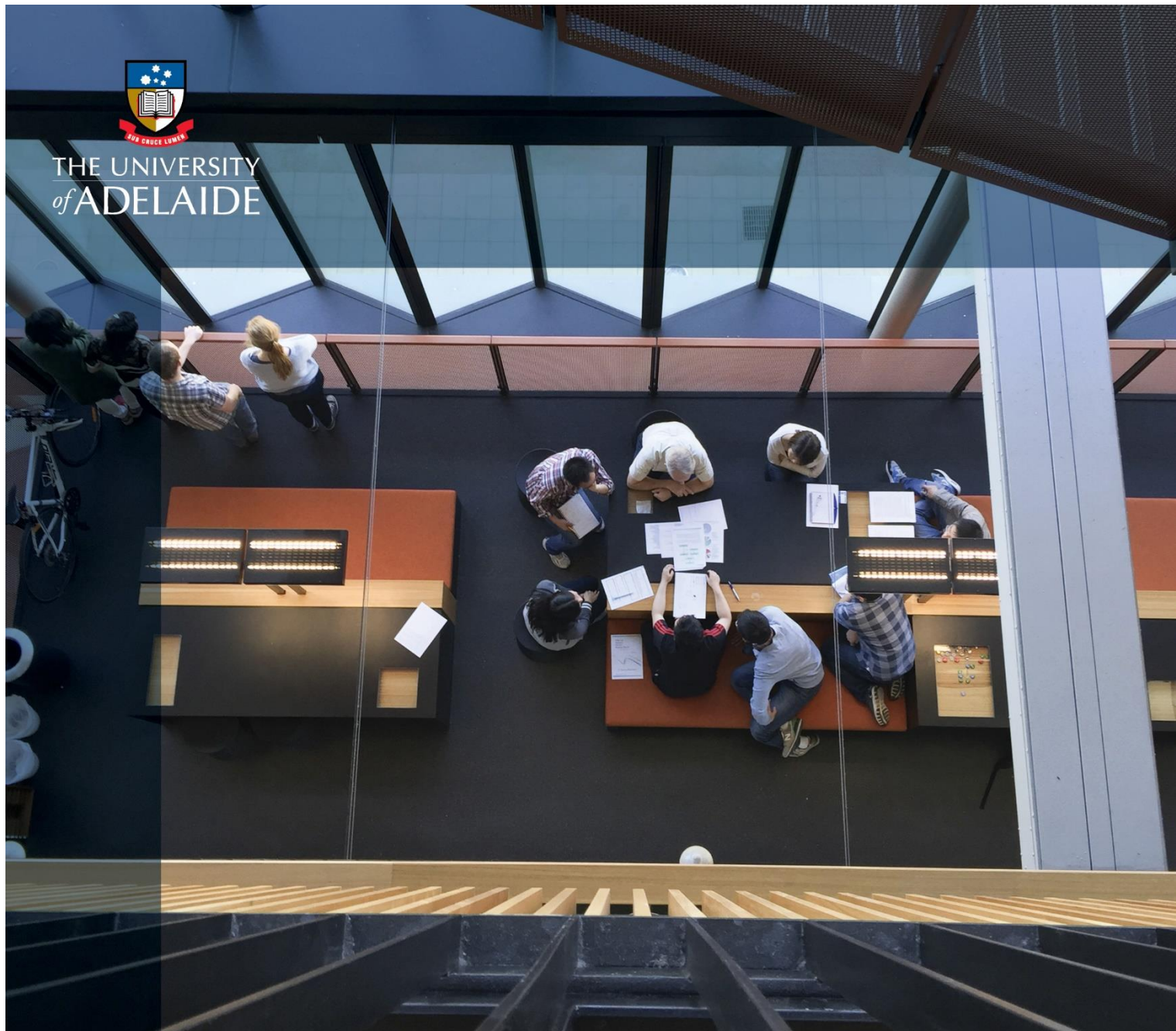




THE UNIVERSITY
of ADELAIDE



THE UNIVERSITY OF ADELAIDE RESPONSE TO THE 2020 ICAC UNIVERSITY INTEGRITY SURVEY

Introduction

In 2020, the Independent Commissioner Against Corruption (ICAC) concluded the ICAC University Integrity Survey (the Survey) of South Australia's three public universities. The results of all three universities were released in early December 2020. The then Interim Vice-Chancellor also shared the [specific results](#) with staff.

The Survey is separate to the ICAC Commissioner's Public Statement (the Statement) about an investigation into the former Vice-Chancellor, which was also released in 2020. The University has committed to adopting all of the recommendations made by the Commissioner in that Statement. The University established the ICAC Response Steering Committee, chaired by Professor Katrina Falkner and supported by an independent consultancy, to shape the University's response to those recommendations. On 24 June 2021 the independent report [Towards a safer and more inclusive culture: University of Adelaide ICAC response](#) was released with 22 recommendations to be adopted in full. A Transforming Culture Implementation Team, chaired by Professor Falkner, was convened to facilitate this process.

The Survey raised a number of matters relating to behaviour and processes. These range from the conduct of research, learning and teaching, supervision and procurement. As part of its response the University has audited its current policies and procedures. The findings of this exercise identify areas where improvements can be made and attribute responsibility for addressing these issues. Given the convergence on findings, many of the issues identified will be addressed by the Transforming Culture Implementation Team.

Background

The Survey was open from 10 March 2020 to 3 April 2020. Of the 3,240 responses that were received from the three SA universities, 1,364 respondents identified as working at the University of Adelaide. These responses should be seen in the context of the University of Adelaide's 4,427 employees who were sent the survey template in February 2019. In her introduction to the findings the Independent Commissioner Against Corruption, the Hon. Ann Vanstone QC, noted that 'the results do not pretend to be a precise depiction of the state of affairs in South Australia's public universities' and that 'like all surveys, this one interrogated the perceptions of respondents'. Without diminishing from the seriousness of the matters raised, it is the case that in many areas of concern there were relatively few respondents. So, for instance, this review addresses matters related to payroll, PhD supervision, and intellectual property, each raised by eight respondents. However, this does not affect the University's desire to address the concerns raised. The University is committed to identifying the behaviours and processes requiring institutional change, and the purpose of this review is to acknowledge and respond to these concerns and to identify areas where improvements can be made.

The Survey's specific findings for the University of Adelaide covered six main areas:

- Awareness and Perceptions of the ICAC and the Office of Public Integrity (OPI)
- Reporting Corruption and Inappropriate Conduct
- Management and the Workplace
- Students and Teaching
- Research /Scholarship and Research Funding
- Corruption and Inappropriate Conduct

The details of the Survey's findings and the University's response are set out in the following section.

Survey Findings

1. Awareness and Perceptions of the ICAC and OPI

The Survey found that University of Adelaide respondents had 'lower levels of awareness of the ICAC than observed in broader public administration (68.5% compared to 79.7%) and of the OPI (50.5% compared to 61.8%)'.

2. Reporting Corruption and Inappropriate Conduct

In comparison to broader public administration, respondents had lower levels of agreement with statements outlining their reporting obligations to ICAC (54.0% compared to 79.7%), and testing their willingness to report to ICAC (57.5% compared to 69.3%).

In terms of reporting internally, quantitative data showed that large proportions of University staff 'may not be confident of what to report, how to report and what reporting behaviours may be expected of them by organisational policies and procedures'.

From the qualitative feedback, the most common concerns related to reporting (79 respondents) and the experience of nothing changing after making a report (52 respondents).

University Response

- *Awareness of reporting obligations to the ICAC and OPI*

Widespread awareness of reporting obligations to the ICAC and OPI, and how these can be acted upon, is essential for a healthy institutional culture. Within the University, communications and training have been provided since 2013 about how and what to report to OPI, with ongoing communications to all staff made by the Legal and Risk Branch since 2015 through newsletters, blogs and targeted reminders. Since 2017, a [Fraud & Corruption Control induction course](#), which presents critical information about fraud and corruption control in the context of University activities, and describes what staff should do if they suspect fraud and corruption in the workplace, has been mandatory for new starters with the University.

A new [website](#) outlines broader integrity and accountability requirements including the Public Officer responsibilities for members of the University of Adelaide community under the *Independent Commissioner Against Corruption Act 2012* (SA). ICAC training resources and further information provided regarding reporting to the Office for Public Integrity are embedded into this website. Education and training is also provided across the University.

- *Reporting internally*

A new [Complaints Resolution \(Staff\) Procedure](#) was developed in 2020 that outlines the informal or formal complaint resolution procedures available to staff. This procedure forms part of the [Behaviour and Conduct Policy](#) and aims to remove barriers to reporting complaints while encouraging open dialogue to resolve complaints. For information about what constitutes fair treatment, staff may contact a [Fair Treatment Contact Officer](#), an independent and confidential contact point for anyone who has questions about bullying, harassment and/or discrimination complaints processes at the University. Complaints involving allegations of criminal or unlawful conduct are directed to the Police, the Office of Public Integrity (OPI) or other relevant authority. Complaints may also be considered under the misconduct procedures set out in the [Enterprise Agreement](#) (section 8.2), while [Whistleblower and Public Interest Disclosure Reporting](#) are available through Legal and Risk Branch and to the Fraud Control Officer and Whistleblower/Public Interest Disclosure Liaison Officer. Internal and external institutional avenues are also available through fraud control policy and conflict of interest disclosures (further information provided on page 13 of this review). Additionally staff and students can report sexual assault or sexual harassment to complaints@adelaide.edu.au.

Notwithstanding the policy and procedural coverage, the above findings serve to highlight a level of complexity that may dissuade or confuse potential reporting. The recommendations from KPMG's *Towards a safer and more inclusive culture; the University of Adelaide's ICAC response* report provide the University with a framework to address these concerns.

Key Review Findings

<u>Findings</u>	<u>Responsibility</u>
<ul style="list-style-type: none"> • An improved mechanism to track, and possibly mandate, targeted ICAC training for staff should be developed to raise awareness. • A simplified and streamlined process, including an initial point of contact, should be developed for internal complaints reporting. 	<ul style="list-style-type: none"> • Transforming Culture Implementation Team (Recommendation 9) • Transforming Culture Implementation Team (Recommendation 15)

3. Management and the Workplace

The Survey reported that a relatively small number of respondents provided negative comments on the University's management or leadership (99 respondents or 2.2% of staff), workplace communication (13 respondents), and how poor conduct was addressed in the workplace (13 respondents). In addition, 54 respondents discussed management's focus on student fees and income at the expense of the University's practices and workforce.

Twenty respondents described negative aspects of the workplace. This included a poor office culture, poor morale, work health and safety issues or other negative aspects of the workplace. Other concerns raised included limited or poor resources (18 respondents), working excessive hours, problems with how work capacity was calculated, or feeling pressured to work more (19 respondents), problems with pay or being underpaid (8 respondents), and colleagues lacking the qualifications or competencies required for their role (17 respondents). Later in the Survey, when considering specific examples of inappropriate conduct, the ICAC Survey found that 93 respondents had described bullying or harassment.

University Response

- *Leadership*

[*Leading at Adelaide*](#), introduced in 2017, is a leadership development framework that supports the development of leadership excellence across the University. The University runs a number of Leadership Development Programs including:

- Professional Leaders Program;
- The Vice-Chancellor's Key Leaders Program;
- Adelaide Women Leadership; and
- Aspiring Leaders.

Capability development is embedded in all components of the University's Leadership Development programs, workshops and activities such as the Leaders and Influencers Forums. An element of all these programs is to provide leaders with the skills to communicate and advance the objectives of the University.

The Planning, Development and Review (PDR) process provides a framework for staff to set performance objectives, contribute to career goals, and work with leaders to review performance outcomes and ensure these are aligned with the University's strategic direction.

- *Workplace Culture*

In early 2020, a new Staff Values and Behaviour Framework was formally endorsed by Vice-Chancellor's Executive (VCE), following staff consultation. An updated [Code of Conduct](#), the companion document to the Framework expressing the expectations of staff and honorary titleholders when undertaking activities in connection with the University, was endorsed by VCE on 12 August 2020.

Together with the Code of Conduct, the Framework articulates a set of key behavioural standards that uphold the University's culture. It is being progressively embedded into University processes with the intent of setting the standard through demonstration.

- *Staff Culture and Engagement Survey*

Since 2004, the University has engaged Voice Project to conduct biennial 'Your Voice' surveys to assess staff satisfaction. The last survey, conducted in 2018, found that staff generally felt positively towards the University, however, in line with other universities, only 44% of staff felt listened to by the senior management team.

On 17 May, the University launched the 2021 Staff Engagement and Culture Survey, delivered through a new survey platform, Qualtrics Cloud Professional. A selection of key questions were retained to compare staff sentiment on University priorities over time and at different stages of the employee lifecycle. The survey has been designed in line with the Staff Values and Behaviour Framework and with input from KPMG, the implementation partner for the University's ICAC Response Steering Committee.

A [summary of the survey results](#) was disseminated to staff on 16 August with these key findings:

- Staff Engagement remains positive, with 70% of survey respondents reporting that they feel connected, motivated and satisfied with their role and the organisation;
- The Civility Index was 73%, highlighting that staff feel that they are being respected and valued by colleagues;
- Supervisor Effectiveness was rated at 71%, meaning that staff are valuing their relationships with their immediate supervisor; and
- The University achieved a Culture Index score of 57%, measuring staff perception of the University's performance in relation to the University's five values: Integrity, Respect, Collegiality, Excellence, and Discovery.

The lowest rated Staff Engagement driver was the University Leadership at 28% overall, with only 29% of staff felt that senior leadership were visible to staff (compared with 46% in the previous survey period).

- *Work Health and Safety*

The University maintains a comprehensive [WHS Policy and Handbook](#) which outlines the University's aim to create and engender a University culture that values health, safety and wellbeing as fundamental components of the work environment, supported by safe systems of work, appropriate governance, training, management structures and operational strategies. As a self-insured employer, the University is required to demonstrate effective management of work health and safety and work injuries through a formal evaluation framework and against specific standards to Return to Work SA. The University monitors compliance with the standards through a quarterly HSW due diligence report to management and governance. Having undertaken the periodic evaluation of the University under the Self-Insurer standards, Return to Work SA has advised that the University of Adelaide has satisfied all requirements of the standards with no non-conformances recorded. As a result a further five year term of registration as a self-insured employer has been confirmed commencing on the 1 January 2022 and ending on the 31 December 2026.

- *Workload*

The Enterprise Agreement sets out the requirement for academic workload models, the maximum annual allocated hours, and the process for lodging a staff grievance (if a workload complaint cannot be resolved with supervisor). Each School is required to have an academic workload model that is reviewed annually and submitted to the Deputy Vice-Chancellor (Academic). The model is approved by the relevant Executive Dean.

The University consults regularly with the NTEU on matters of major organisational change and workload, applying the processes for each which are prescribed in the Enterprise Agreement. Section 8.5 of the Enterprise Agreement provides for dispute settlement procedures.

No formal database is kept by the University to track staff complaints regarding workload or other workplace complaints that are unable to be resolved informally and locally as is encouraged under the Complaints Resolution (Staff) Procedure. Transparency would be improved by tracking and reporting on all workplace complaints and reporting these annually.

- *Payroll Accuracy*

The University uses a number of preventative controls to ensure payroll accuracy. The University's salary scales, leave accrual formulae and superannuation options are configured in the payroll system. These configuration settings maintained through scheduled 'mass system processes' (such as a scheduled pay rise, or change to tax rates) are subject to thorough system and user acceptance testing and reconciliation back to the Enterprise Agreement and legislation.

There have been a number of recent reviews of the Payroll Controls environment, including a 2018 internal audit over payroll, a 2019 internal audit over leave management, and a review of payroll controls by the Auditor-General in 2019 and 2020. The majority of recommendations have been accepted and implemented.

- *Academic Staff Qualifications*

It is a requirement of the [Higher Education Standards Framework](#) (HESF) that academic staff are qualified to at least one AQF level higher than that being taught, or have been assessed as having equivalent experience (EE). This is also a requirement of the University's [Recruitment Policy](#) and [Staff Qualifications Procedure](#). The Hiring Manager is responsible for collecting and checking the sufficiency of evidence of the preferred candidate's qualifications.

Learning and Quality Support undertake an annual academic staff qualifications check and the results are reported to the University Education Committee. The 2020 compliance check of staff qualifications across the University showed that most staff are appropriately qualified or supervised, with 12 staff shown to be non-compliant. In these cases, in line with the Staff Qualifications Procedure, the Head of School assessed the academic staff member's equivalence for the relevant AQF level, considering the full range of relevant, verifiable professional activities of the individual. These 12 staff have now been assessed as having equivalent professional experience in their relevant discipline. This assessment has now also been built into the induction of new staff.

Key Review Finding

Finding	Responsibility
<ul style="list-style-type: none"> • The establishment and/or review of data recording and management processes to capture information relating to workplace complaints should be considered. 	<ul style="list-style-type: none"> • Transforming Culture Implementation Team and Human Resources

4. Students and Teaching

The Survey noted that ‘many respondents described problems relating to student admission, teaching and grades’. A total of 50 (~1.1% of staff) respondents discussed students being admitted to courses who were not likely to succeed, 26 described negative aspects of admission to courses and eight described there were too many students to effectively teach. Comments included in the Survey also raise concerns with students’ levels of English proficiency and with class sizes.

A total of 119 respondents discussed problems with ‘grading students’.

University Response

- *Student Admissions Policy*

The University has well-established policies and procedures in place to govern the admissions process and ensure that students have the academic preparation and English language proficiency to participate successfully in their studies. The University’s current [Admissions to Coursework Programs Policy](#) was approved by Academic Board and became effective in August 2016. The policy is currently under review in accordance with the [Adelaide Policy Framework](#). The aim of the review is to ensure that the Policy is strengthened to better support the consistent and equitable application of admissions policies and processes, enabling students to achieve the intended learning outcomes and complete their studies successfully, and to safeguard the quality and reputation of the University.

Entry requirements are considered by the Academic Program Entry and Approval Committee (APEAC), with operational admissions matters dealt with in a dispersed, ad hoc way via various operational groups. The resulting memoranda that come to APEAC are formally registered. A more streamlined approach with oversight from a single decision-making body would be beneficial and should be considered to make further improvements in this area.

- *English Language Proficiency*

International students seeking admission to the University’s coursework academic programs must meet the University’s minimum requirements as set out in the [Minimum English Language Requirements](#) document. The University’s standard minimum International English Language Testing System (IELTS) entry requirements were increased from 6.0 to 6.5 with effect from 1 January 2018 following the outcome of a review by a working group established in 2015. Further benchmarking is required to establish if this, and the University’s range of [preferred accredited English language tests](#), remain at the appropriate level.

Initial assessment of an applicant’s English language ability is undertaken by SATAC in accordance with University requirements. Where SATAC determines that an applicant does not meet the English language requirements, the University’s Admissions team may consult the internal business document, ‘*Alternative English Language Proficiency Pathways*’. This outlines other criteria that are considered to provide sufficient evidence of an applicant’s English proficiency, such as English credentials through secondary schooling in another country. A review of this process is timely to ensure it appropriately reflects modern sector practice.

Where an applicant does not meet either the published English language standards or any of the requirements in the *Alternative English Language Proficiency Pathways* document, then a waiver may be requested. Approval for this process has recently shifted from the faculties to the central Admissions team and, although being rarely used (only twice in 2020), should also be reviewed.

- *Academic Standards*

For undergraduate programs, academic entry requirements are the qualifications considered for entry (e.g. Year 12, VET study etc.); for postgraduate coursework programs, minimum academic entry criteria are specified (e.g. a minimum GPA in appropriate undergraduate study or an

acceptable level of maths). The University does not permit academic waivers. Where international applicants do not meet academic entry requirements, they will either be directed to an alternative award program for which they do meet entry requirements, or directed to a pathway program. Where domestic students do not meet academic entry requirements, no waivers are permitted and applicants may be directed to the Special Tertiary Admissions Test.

- *Class Sizes and Student/Staff Ratios*

In February 2021 the University was provided with TEQSA's provisional risk assessment for 2020 which saw Risk 6, relating to student staff ratios, assessed as low. The University also meets TEQSA's Higher Education Standards Framework (HESF) requirement to demonstrate *'sufficient staffing to meet the educational, academic support, administrative and access needs of cohorts undertaking a course [program] of study'*.

Whilst the [Timetabling policy](#) refers to issues around public safety in relation to class sizes, no policies refer to limiting class sizes in order to ensure an optimal learning experience for students. This should be considered as part of a review of the [Coursework Academic Programs Policy](#) and the Timetabling Policy, with reference to benchmarking against other institutions.

- *Assessment for Coursework Programs Policy*

The University has a well-established suite of policies, procedures and processes in place to govern grading and assessment practices. These are accompanied by guidelines and practices that demonstrate and support the University's commitment to grading and assessment integrity. The [Assessment for Coursework Programs Policy](#), which underpins the University's approach, was approved by Academic Board in 2015.

In 2018, all relevant academic policies, including the Assessment for Coursework Programs Policy, were made subject to the University's Code of Conduct and [Academic Board Statement on Undue Influence](#). Any attempts to improperly exert pressure or influence actions or decisions made pursuant to the Assessment Policy are required to be reported in accordance with the [Fraud and Corruption Control Policy](#). The University's Legal and Risk department has confirmed that it is not aware of any concerns or allegations of this nature being raised under the fraud policy, while Human Resources has advised that it is not aware of any misconduct allegations relating to changing grades; nor has any such issue been raised under the Staff Complaints Procedure.

The Assessment Policy requires that faculties establish processes and quality assurance practices; however it does not mandate or provide guidance on how to approach this. The Assessment Policy is currently under review and best practice policies, procedures and guidelines regarding grading practices and standards at other institutions will be considered. This will need to be conveyed and implemented at a faculty level.

A broader discussion about assessment strategy at the University and the role of exams will also be conducted through a University-wide academic and strategic review and consultation project regarding assessment, expected to be presented to Academic Board for endorsement later this year. The outcomes of this review and consultation will inform any revision of the University's Assessment Policy.

- *Grading*

The University's [Grading Guidelines](#) contain a requirement for faculties/schools to audit 10% of grades for each course and to verify, before posting grades, all components of assessment have been included and grades have been entered into the PeopleSoft system correctly. Executive Deans provide twice-yearly confirmation to the Deputy Vice-Chancellor & Vice-President (Academic) that the audit requirements have been conducted.

External benchmarking to demonstrate the University's adherence to its own standards, including marking rubrics, has been conducted via the University's participation in the Group of Eight (Go8) Quality Verification System (QVS) from 2011 to 2018. The QVS is designed to provide public assurance and confidence that learning outcomes are comparable across grades and in line with world-leading universities, and to ensure that Go8 universities are grading students using equivalent standards.

- *Accreditation*

The University offers over 65 programs which are externally accredited by professional organisations. A list of externally accredited programs is located on the University's Professional Accreditation [website](#).

The accuracy of the information provided to accrediting bodies is a faculty responsibility, and a [business process](#) has been established for faculties to follow for any program that is professionally accredited. Once granted accreditation, audits by external professional bodies are undertaken (usually every five years) to ensure standards are being met. The University's approach is aligned with the other members of the Go8, the two South Australian universities and six other universities (CSU, Curtin, Griffith, La Trobe, Macquarie, Wollongong), against whom benchmarking has been undertaken. A review and revision of these procedures should consider what constitutes best practice in this space.

- *Academic Integrity*

The University has developed a response to the challenge of academic integrity and student cheating in assessment of coursework consistent with sector best-practice. The University introduced a revised [Academic Integrity Policy](#) in July 2020 after a significant period of policy revision and consultation during 2019 and 2020. The policy update resulted in several significant changes to the way in which academic integrity is conceived and managed in the University, and seeks to:

- place greater emphasis on an educative approach to academic integrity, reflecting sector-level good practice;
- improve procedures for managing allegations of academic misconduct to enable any allegations to be more consistently applied and less burdensome for individual academic staff;
- place greater emphasis on quality assurance and continuous improvement of academic integrity management at University level; and
- adopt a written style that is more accessible and comprehensible to all students and staff.

The University has also developed the [Academic Integrity Plan for 2020-2022](#) which details the University's strategy and activities to support academic integrity in four key areas:

- community and culture;
- education and prevention;
- detection and deterrence; and
- governance and monitoring.

The plan is designed to reduce academic misconduct and enhance students' ability to display integrity in their assessed work. However, the University recognises that by building awareness of academic integrity and sharpening the focus on misconduct across the institution, it is likely that detection will improve and rates of detected misconduct may increase. Other actions in the plan will work to reduce the likelihood of students breaching the Academic Integrity Policy.

Further resources and training will be developed and offered for staff and students, including the creation of Academic Integrity student and staff champions. The University also continues to develop measures to prevent and detect breaches of Academic Integrity in the context of digital assessments, including online exams. Measures to improve online exam integrity include a pilot of remote proctoring

in 2021. Following the introduction of un-invigilated, open-resource online exams in 2020 as an emergency response to the pandemic circumstances, the University introduced a phased return to invigilated exams in 2021 including through online proctoring of online exams.

In 2020, there was an increase of confirmed breaches of the Academic Integrity Policy associated with the introduction of online assessment, particularly in respect of online open resource exams as part of the COVID-19 response. This observation is not unique but widely observed across the sector. In 2021, a wide range of mitigation actions have been developed, including assessment redesign, participation in the online invigilated exam pilot, and increased student and staff education and training. It has also been identified that the University requires a formal whistle-blower process to enable students to report suspected cases of academic misconduct while being afforded appropriate protections. This process will be aligned with the University's [Whistle-blower Policy](#).

Key Review Findings

Findings

- The Academic Program Entry and Approval Committee (APEAC) committee should consider admission policy, standards and quality, plus operational matters of load, quotas and individual admission decisions.
- Benchmarking for the University's range of preferred accredited English language tests should be refreshed to ensure University entry requirements remain aligned with the sector.
- Governance of the procedures for use of alternative English language pathways and waivers should be reviewed and where necessary strengthened.
- A review of relevant policies should consider reference to ensure appropriate class sizes.
- A best practice standard Assessment Policy, determined by the current policy review and informed by the University-wide academic and strategic review of assessment, should be implemented across the University.
- Consideration should be given to the re-introduction of the Go8 Quality Verification System (QVS), or a similar benchmarking process, to assess the University's grading standards.
- The University would benefit from a review and revision of its procedures for program accreditation.
- Significant reform to improve Academic Integrity has been developed and will continue to be implemented alongside the development of a formal whistle-blower process for academic misconduct.

Responsibility

- Deputy Vice-Chancellor (Academic)

5. Research/Scholarship and Research Funding

The Survey highlighted a number of responses concerned with research and research funding including 37 respondents (0.8% of staff) who discussed problems with publishing, including pressure to publish, authorship problems and 'gaming' of citation indices. Other issues raised included alleged breaches of research integrity (17 respondents), the quality of research (eight respondents), issues with intellectual property (eight respondents), problems with PhD supervisions (eight respondents) and five respondents feeling 'exploited' to do research work.

In addition, 14 respondents described some form of 'favouritism' in the allocation of grant or other research funding, 19 described problems of 'falsified data in grant applications or output', 13 respondents raised concerns about working with third parties, and nine raised 'not fulfilling grant requirements'.

6. Corruption and Inappropriate Conduct

As outlined by the Survey, 44 respondents described what could be seen as ‘poor integrity behaviours (hiding problems, putting reputation above resolving problems)’ or described the organisation as ‘corrupt’ and 82 participants described the University as ‘having limited integrity controls or that these were problematic’.

In addition, 88 respondents described some form of ‘favouritism nepotism (including favouritism in hiring)’, 28 had ‘encountered discrimination’, 33 respondents raised ‘concerns with hiring procedures (outside of favouritism)’ and 24 respondents discussed ‘problems with work contracts or employment types’.

The survey also found that 57 respondents discussed ‘apparent financial misconduct or misuse (including grant monies)’, 31 described ‘concerns with procurement and consultancies’, 38 respondents raised ‘a failure to follow policies, procedure or legislation’, ‘a failure to appropriately declare and manage conflicts of interest’ was noted by 26 respondents, and 27 respondents discussed ‘problems in working with connections with industry or third parties’.

The Survey also found that 21.1% of respondents agreed that their workplace had databases or systems storing sensitive information, such as financial data or people’s personal details, which could be accessed with generic or shared login details.

University Response - Research/Scholarship and Research Funding

- *Research Integrity*

The University expects all researchers associated with the institution to abide by the basic principles of Honesty, Rigour, Transparency, Fairness, Respect, Recognition, Accountability and Promotion (of responsible research practices) as outlined in the [Australian Code for the Responsible Conduct of Research 2018](#) (the Code). To assist researchers, the University has formally adopted the Code through its [Responsible Conduct of Research Policy](#) and has developed a range of policies and procedures to support the specific responsibilities outlined in the Code.

The [Research Misconduct Procedure](#) is tied to a principle of the Responsible Conduct of Research Policy and is designed to meet the requirements of the Code in relation to the University’s processes for receiving, investigating and managing Complaints of Breaches of the Code. The procedure aligns as far as possible with the ‘*Guide to Managing and Investigating Potential Breaches of the Australian Code for the Responsible Conduct of Research*’, taking into account particular aspects and structures of this University. Complainants are directed to write to the University’s Research Integrity Officer and, if appropriate, to an Authorised Disclosure Officer under the Whistleblower Policy, or to the Office of Public Integrity under the *Public Interest Disclosure Act 2018* (SA).

The [Authorship Policy](#) is also designed to promote good practice and ensure University compliance with the Code. It utilises guidance in the Code’s associated *Authorship Guide*, and outlines a set of ethical principles and procedures associated with matters, including the requirements for the appropriate attribution of authorship in research outputs.

The [Research Data and Primary Materials Policy](#) addresses the requirements of the University and its research community to manage and retain research data in a responsible manner. It affirms the University’s commitment to compliance with the Code and sets out responsibilities on the retention, disposal, ownership, storage and confidentiality of research data and primary materials.

- *Intellectual Property*

Through the [Intellectual Property Policy](#), the University promotes open access to, and dissemination of, knowledge and encourages its staff and students to share their findings. This Policy aims to

encourage originators of IP to be active participants in the systemic exchange and application of research findings and outcomes; to leverage the strengths of all parties, internal and external; and to ensure IP access and ownership arrangements are clear, fair and work to deliver optimal impact. This Policy supports the principles relating to the management of IP that are embodied in the Code and the [*National Principles of Intellectual Property Management for Publicly Funded Research*](#).

- *Research Education and Supervision*

Following a review that concluded in March 2021, the [*Research Education and Supervision Policy*](#) has been considerably broadened to encompass all aspects of the research supervision experience at the University. In accord with the *Australian Code for the Responsible Conduct of Research 2018*, and informed by the *Code Supervision Guide 2019*, it outlines a set of principles and procedures associated with the research education and training environment, and adds clarity to the roles and responsibilities of all those involved in research supervision and mentorship.

- *Research Funding*

The [*Research Grants, Contracts and Consultancies Policy*](#) encourages staff members to secure external research funding in support of their research and the University's strategic vision. It includes a principle on the requirements for research funding proposals and agreements to provide sufficient value to the University to justify involvement; be consistent with the University's strategic vision; be compatible with the efficient discharge of a staff member's duties; and to comply with the general principles of contracting.

- *Research Ethics*

The University adheres to relevant legislation and promotion of best practice for research related to Human and Animal Ethics, Biosecurity, Gene Technology, Export Controls and the Defence Trade Controls Act. The University's research ethics framework provides support for researchers seeking to conduct their research projects in a safe, ethical and approved manner; provides protection for human and animal participants involved in such research; and helps to ensure public confidence in university research.

- *Researcher Development Program and Framework*

The University has commenced work on a contemporary Researcher Development Program and Framework to underpin the institutional approach to developing and supporting world-class researchers. The aim is to plan for a comprehensive development experience that will assist researchers to manage their research more effectively, meet their compliance obligations and advance their research careers. Working closely with relevant areas across the University, a whole-of-institution approach is intended through the provision and delivery of a range of career and professional development programs, which should be available to all active researchers (including HDR students) at their various career stages. The design of the Framework is to be completed in phases over the next 12 months.

University Response - Corruption and Inappropriate Conduct

- *Integrity Controls*

The University of Adelaide has a number of public accountability obligations and is accountable to regulators, auditors and funding bodies for the expenditure of public monies. An overview of this accountability and obligations is provided [here](#). Integrity controls are in place through segregation of duties, role statements and position descriptions; and system-driven access controls.

The University is audited through both internal and external audit programs (the Auditor General and the service provider appointed to be the Internal Auditor – currently EY). Both programs design reviews that are assurance- and compliance-based. In addition, the University is audited by TEQSA, National Health and Medical Research Council, Return to Work SA and other specialist agencies in

research such as AQIS. Both governance and management are required to respond annually on the risk of fraud through the response to the Auditor General's annual risk of fraud inquiry.

- *Conflicts of Interest*

The [Conflict of Interest Procedure](#) prescribes the process for identifying, reporting and managing conflicts of interest (actual, potential or perceived) at the University in conjunction with the Code of Conduct, Behaviour and Conduct Policy and the Fraud and Corruption Control Policy. The University promotes a culture where conflicts of interest are properly identified, disclosed and resolved or managed in a transparent, accountable and timely manner. Staff must structure their personal, external or financial interests in a way that preserves confidence in their integrity and prevents conflicts of interest arising.

As outlined by the [Council Policy on Conflicts of Interest](#) the University expects Council and Committee members to maintain the highest professional standards when fulfilling the duties associated with their position or office.

Feedback suggests that the University's policy and procedural management of conflicts of interest requires further attention. This is agreed. The policy should be reviewed to ensure that it addresses the requirements and obligations imposed from external (to the University) laws and compliance frameworks, particularly in light of recent legislative compliance obligations imposed by the Commonwealth Government in the area of foreign interference obligation.

- *Hiring and employment contracts*

The [Conflict of Interest Procedure](#) specifically identifies recruitment and appointments as processes that a staff member may not be involved with if the applicant is a relative or someone with whom they have had a close personal relationship (Section 4.2.11.1).

The [Recruitment Policy and Procedures](#) sets out principles and procedures to ensure staff recruitment and selection practices are consistent, merit-based and aligned with the University's primary goals of teaching, research and research training.

- *Financial Misconduct*

The University has been entrusted with public and private funds to fulfil its mission of learning and teaching, research and community engagement. In carrying out activities to support its mission, the University must comply with specific financial administration, accounting, control, management, audit and reporting requirements, as specified in legislation and by various government and auditing agencies including the South Australian Auditor-General.

To assist the University to meet these requirements, the [Financial Management Policy](#) and a series of detailed procedures have been developed. Their purpose is to ensure that University funds and resources are used only for University purposes, and that appropriate financial controls are developed, documented and applied to prevent the abuse or misuse of University funds and other resources.

The [Fraud and Corruption Control Policy](#) and procedures are also applicable, and provide examples of what constitutes fraud and corruption in the context of a range of strategies, plans, individual responsibilities and reporting procedures.

The finance procedures appear complex, which may inhibit accessibility by staff. Feedback has suggested that staff training, particularly through the induction process, would benefit from further finance and procurement content and that specialised training should be offered for relevant local areas. The University is currently exploring, through an Organisational Sustainability Program, ways

to improve efficiencies in administrative services including the simplification of processes and procedures that are cumbersome.

- *Misuse of grant monies*

The [Financial Management policy](#) is the overarching policy to ensure University funds and resources are used only for University purposes, and that appropriate financial controls are developed, documented and applied to prevent the abuse or misuse of University funds and other resources.

Staff members are encouraged to secure external research funding in support of their research and the University's strategic vision. External funding includes Competitive Research Grants, and Contract Research, which are a critical part of the University's activity. The [Research Grants, Contracts and Consultancies Policy](#) sets out the structures within the University that support and govern these activities including items [defined as Consulting](#) and examples of [Eligible and Ineligible Expenditure](#).

The University is contractually obliged under a Funding Agreement with the Commonwealth Government to prepare reports and acquittals for research funding received from the Australian Research Council (ARC). The [ARC Research Grant Acquittal and Carry Forward Procedures](#) set out the responsibilities and tasks associated with ARC grant acquittals to ensure the University's contractual obligations are met. Similarly the [NHMRC Research Grant Acquittal and Carry Forward procedures](#) sets out the responsibilities and tasks associated with NHMRC grant acquittals and carry forwards, to ensure the University's contractual obligations are met.

- *External Consultants*

The engagement of consultants or contractors is considered broadly within the [Procurement Procedures](#), which sets out the principles and processes for the procurement of goods and services on behalf of the University, and apply to staff, students, titleholders and the procurement of all goods and services using University funds, regardless of revenue source. This includes the use of [Preferred Suppliers](#) and [Tender evaluation process](#) for University suppliers.

- *Cyber Security*

The purpose of the [IT Acceptable Use and Security Policy](#) is to:

- give a clear statement to all users of University IT facilities of their responsibilities, including what constitutes acceptable and unacceptable use;
- manage the provision and modification of access to online services; and
- express the commitment of the University to providing and maintaining a secure, effective and reliable IT infrastructure to support the University's operations.

The IT Acceptable Use and Security Policy is supported by two sets of procedures:

- The [Access and Accounts Procedures](#), which support the IT Acceptable Use and Security Policy by:
 - clarifying the responsibilities of users of University IT; and
 - prescribing how breaches of the Policy will be handled.
- The [IT Security Procedures](#), which support the principles of the IT Acceptable Use and Security Policy by:
 - establishing clear responsibilities of University IT custodians; and
 - establishing requirements for technical controls to protect the security of information assets.

The University's 'IT General Controls' are audited on an annual basis as part of the broader Attorney-General Controls assessment. Individuals requiring Human Resources, Finance and Student Business System Access are required to complete a form outlining access requirements, and those approved

for access are required to enter into an access and usage agreement governing use of confidential information. If an individual accesses the information inappropriately, the University's misconduct processes under the Enterprise Agreement would apply.

In 2021, the University is implementing a Cyber Security Awareness and Education initiative, which involves addressing risks associated with IT systems that are not managed by ITDS, but owned and managed by faculties and affiliated organisations.

Key University Findings

<u>Findings</u>	<u>Responsibility</u>
<ul style="list-style-type: none"> University of Adelaide researchers are governed by a wide range of external and internal Codes, regulations, policies and procedures. The development of a Researcher Development Program and Framework will assist researchers to manage their research more effectively and meet their compliance obligations. The University's policy and procedural management of conflicts of interest would be improved by an institution-wide system for recording conflicts when declared. Staff training and induction processes would benefit from further finance and procurement content and specialised training should also be offered to local areas. The University's financial procedures appear overly complex and should be consolidated and simplified to improve their accessibility to staff. 	<ul style="list-style-type: none"> Deputy Vice-Chancellor (Research) Transforming Culture Implementation Team (Recommendation 21) Chief Financial Officer Chief Operating Officer (through the Organisational Sustainability Program)

Conclusion:

The University of Adelaide has reviewed its policies and procedures and made 15 key findings in relation to matters raised in the ICAC University Integrity Survey. Responsibility for addressing these findings has been allocated to relevant portfolio leaders who will report back to the Vice-Chancellor's Executive Committee on implementation progress.

This review took place in the context of the University accepting the eight recommendations from the ICAC Public Statement and the 22 recommendations from the independent *Towards a safer and more inclusive culture; the University of Adelaide's ICAC response* report. A Transforming Culture Implementation Team, led by Professor Katrina Falkner, has been established to guide this process and will be asked to assume responsibility for findings from this review that align with the team's mandate.