Fraud and Corruption Control Policy

Section 1 - Summary

(1) This Policy outlines the University's commitment to ethical conduct, integrity, and compliance with its legal and regulatory obligations. It forms part of the University's Staff Integrity Framework and supports the reporting of suspected misconduct, including fraud and corruption.

(2) This Policy:

a. establishes the University's approach to preventing, detecting and responding to fraud and corruption, and provides a safe and transparent mechanism for reporting fraud or corrupt conduct while supporting appropriate confidentiality, welfare and anti-retaliation measures for whistleblowers and disclosers;
b. takes reasonable steps to protect individuals who make disclosures from detrimental action and have their reports investigated in a fair and confidential manner; and
c. supports a culture of integrity, transparency, accountability and safety, where individuals are encouraged to raise concerns about suspected fraud and corruption in good faith without fear of reprisal or adverse treatment.

Section 2 - Scope

(3) This Policy applies to suspected fraud, corruption and other improper conduct, whether raised by individuals or identified through University processes, in accordance with applicable legislation.

(4) This Policy applies across the University to all members of the University community, including:

a. staff (including casual and sessional staff);
b. students (including higher degree by research students);
c. contractors, consultants and their employees;
d. Council members and members of its committees;
e. honorary, visiting and adjunct appointees, and affiliates;
f. volunteers; and
g. any other persons or entities who perform work for or on behalf of the University, including University partners.

(5) This Policy does not apply to:

a. work-related grievances or student complaints about academic matters or services, which are handled under the Complaints Policy.
b. research integrity matters, which are managed under the University's Research Integrity Policy framework. However, where a matter involves suspected fraud or corruption, such as misuse of university funds or resources, it will be managed in accordance with this Policy, in coordination with relevant Research Integrity processes where appropriate.

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Application of legislation

(6) The primary legislative instruments that apply to VU are the Public Interest Disclosures Act 2012 (Vic) and the Independent Broad-based Anti-corruption Commission Act 2011 (Vic).

(7) The Corporations Act 2001 (Cth) also applies to parts of the University (including VU Online), and statutory whistleblower protections apply under that legislation.

(8) Depending on the nature of the disclosure and the entity involved, different legislative requirements, reporting pathways and protections may apply, but irrespective of those differences, all fraud and corruption disclosures will be managed under the single process described in the Fraud and Corruption Control - Disclosure and Whistleblower Procedure.

Section 3 - Policy Statement

(9) This Policy forms part of the University's Staff Integrity Framework and is underpinned by the following principles in the management of disclosures:

a. Integrity: Staff act lawfully, ethically, transparently and in the University's best interests.
b. Accountability: Staff are accountable and responsible for their actions, decisions and use of resources, and participate constructively in reporting and response processes.
c. Legislative Compliance: The University complies with applicable legislative and regulatory obligations governing fraud and corruption control, public interest disclosures and whistleblower protections in all jurisdictions in which it operates.
d. Procedural Fairness: Integrity matters are managed through fair and transparent processes. Decision-makers act impartially, make decisions free from bias, and ensure processes are applied consistently and without disadvantage.
e. Stewardship: Staff uphold public trust through responsible use of information, systems and resources.
f. Respect and Safety: Staff uphold a respectful, inclusive, open, safe working and learning environment.
g. Transparency: Staff act openly, use consistent and compliant processes, and contribute to a culture where concerns can be raised and addressed

(10) The University has zero tolerance for retaliation against any person who makes, or proposes to make, a disclosure. Any retaliation will be treated as serious misconduct and may result in disciplinary action in accordance with the relevant industrial instrument (for staff) or the Student Misconduct Regulations 2019 (for students).

(11) Further details on who can make and receive a disclosure, as well as the process for making a disclosure, are outlined in the Fraud and Corruption Control - Disclosure and Whistleblower Procedure. Additional guidance on the types of conduct that may be disclosed under Victorian and Commonwealth legislation is provided in Attachment 1 – Disclosable Matters under Whistleblower Legislation.

(12) A person will not be disadvantaged for making a disclosure in good faith, even where the disclosure is not substantiated. However, disclosures should be made on reasonable grounds. Individuals who knowingly make false or vexatious disclosures may be subject to disciplinary action in accordance with the relevant industrial instrument (for staff) or the Student Misconduct Regulations 2019 (for students).

Section 4 - Procedures

(13) Fraud and Corruption Control Procedure

(14) Fraud and Corruption Control - Disclosure and Whistleblower Procedure

Section 5 - HESF/ASQA/ESOS Alignment

(15) HESF: Standard 6 Governance and Accountability; 7.1 Representation; 7.3 Information Management

(16) Outcome Standards for NVR Registered Training Organisations 2025: Standard Standard 4.3 Risk Management; 2.7 Feedback, Complaints and Appeals. Compliance Standards for NVR Registered Training Organisations and FPP Requirements 2025: Standard 20 Compliance with Laws.

Section 6 - Definitions

(17) Disclosure: A verbal or written report made to the University raising concerns about suspected fraud, corruption, improper conduct or other wrongdoing.

(18) Corrupt Conduct: Has the meaning given in section 4 of the Independent Broad-based Anti-corruption Commission Act 2011 (Vic). Examples of corrupt conduct may include bribery, secret commissions, misuse of public position or authority, breaches of public trust, misuse of information, obtaining a benefit through improper influence, and attempts or conspiracies to engage in such conduct.

(19) Detrimental action (including retaliation): Refers to any reprisal, disadvantage or adverse treatment taken against someone because they have made, or intend to make, a disclosure, or have cooperated in a disclosure process. This includes actions causing injury, loss or damage, harassment, intimidation, discrimination, disadvantage or adverse treatment, including the taking of disciplinary action.

(20) Fraud: Any dishonest activity causing actual or potential financial loss to any person or entity, including theft of moneys or other property, by staff or persons external to the University 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*.

The theft of property by a person or persons internal to the University but where deception is not used is also considered ‘fraud’ for the purposes of the Fraud and Corruption Control Policy and Procedures.

*(Australian Standard AS 8001-2008 Fraud and Corruption Control, page 15).

(21) Improper Conduct: Conduct that is dishonest, unlawful, unethical, corrupt, fraudulent, or otherwise inconsistent with the proper performance of public functions or responsibilities, including fraud, corruption and other serious wrongdoing. Refer to the Public Interest Disclosures Act 2012 (Vic).

(22) Public Interest Disclosure (PID): A public interest disclosure is a report, complaint or allegation made to IBAC or the Victorian Ombudsman by an individual or group about improper conduct by a public officer or public body, or detrimental action taken in reprisal for such a disclosure.

(23) Whistleblower Disclosure: A disclosure that qualifies for protection under applicable whistleblower or public interest disclosure legislation.

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