Fraud and Corruption Control - Disclosure and Whistleblower Procedure

Section 1 - Summary

(1) This Procedure outlines how disclosures can be made and describes how disclosures are received, assessed, investigated and managed by the University. It also explains the supports available to individuals making disclosures and the legislative protections that may apply in certain circumstances.

Section 2 - Scope

(2) This Procedure applies to the making, receipt, assessment and management of disclosures relating to suspected fraud, corruption and other improper conduct.

(3) The University manages disclosures in accordance with applicable Victorian and Commonwealth legislation. Depending on the nature of the disclosure, different legislative protections, reporting pathways and notification obligations may apply.

(4) The University will apply appropriate confidentiality, welfare and anti-retaliation measures to individuals who make disclosures under this Procedure. Additional statutory protections may apply where a disclosure falls within the scope of applicable Victorian or Commonwealth legislation.

(5) This Procedure:

a. applies to all reports of suspected fraud, corruption or other improper conduct, whether raised by an individual or identified through management, supervisory, audit or other internal processes;
b. does not cover work-related grievances or student complaints about academic matters or services, which are handled under the Complaints Policy; and,
c. does not apply to research integrity matters, which are managed under the University's Research Integrity Policy framework. However, where a matter involves suspected fraud or corruption, including misuse of University funds or resources, it will be managed in accordance with this procedure. Where a matter involves both research integrity considerations and suspected fraud or corruption, including misuse of University funds or resources, it will be managed in coordination with the relevant Research Services.

(6) For offshore campuses and controlled entities, including VU India, reports may also be received and managed through approved local reporting mechanisms, provided they are functionally equivalent to the requirements of this Procedure. All disclosures received through local reporting mechanisms must be reported to the Fraud and Corruption Control Officer and remain subject to the University's governance and reporting requirements.

Section 3 - Policy/Regulation

(7) Fraud and Corruption Control Policy

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Section 4 - Procedure

Part A - Summary of Roles and Responsibilities

Role	Responsibilities
Fraud and Corruption Control Officer (Chief Risk Officer)	Receives and coordinates disclosures relating to fraud, corruption, and integrity matters. Acts as the authorised recipient for whistleblower disclosures made under the Corporations Act 2001 (Cth) on behalf of the University and its controlled entities. Conducts preliminary assessments of suspected improper conduct to determine appropriate handling. Determines whether matters are investigated internally or externally, and whether legal advice is required. Ensures appropriate protections and support measures are in place for individuals involved in disclosures. May, at their discretion, convene the Fraud Disclosure Committee to review disclosures and recommend an investigation approach. In doing so, is responsible for identifying potential conflicts of interest and determining appropriate Committee composition for each matter. Appoints and oversees investigator(s), where appropriate. Ensures appropriate corrective actions, governance responses, and reporting.
Public Interest Disclosure Coordinator (PID Coordinator)	Appointed by the the Vice-Chancellor, as required, to coordinate matters arising under the Public Interest Disclosures Act 2012 (Vic), the Independent Broad-based Anti-corruption Commission Act 2011 (Vic), and related obligations. Acts as the University's liaison with IBAC and the Victorian Ombudsman and provides advice on legislative compliance. This role can be held by the Fraud and Corruption Control officer or another nominee as appropriate.
Principal Officer (Vice-Chancellor)	Ensures compliance with the University's statutory obligations under the Independent Broad-based Anti-corruption Commission Act 2011 (Vic). Makes mandatory notifications to IBAC where required by law. Receives escalation of significant fraud and corruption matters as appropriate.
Investigating Officer(s)	Conducts investigations in a fair, impartial and timely manner. Maintains confidentiality and handles information in accordance with legal and University requirements. Prepares findings and reports in accordance with this Procedure.
Discloser (Reporter)	Raises concerns regarding suspected fraud, corruption or other improper conduct. Provides evidence or information to support the disclosure, where possible. Cooperates with the investigation, where appropriate. May make a disclosure to the Independent Broad-based Anti-corruption Commission (IBAC) or the Victorian Ombudsman under applicable public interest disclosure legislation. May be entitled to protections available under applicable legislation.
Fraud Disclosure Committee	Provides oversight of significant disclosures and fraud and corruption matters referred by the Fraud and Corruption Control Officer. Considers the appropriate investigation approach, risk management, and procedural fairness. May request information from relevant stakeholders to inform its deliberations and recommendations. May, in appropriate circumstances, recommend or support referral of a matter to an external investigator to ensure independence or address the nature or seriousness of the matter. Composition: The Committee consists of at least four members (including the Chair and Deputy Chair) who are independent of the matter under consideration, comprising: The Chief Risk Officer (Chair) The General Counsel (Deputy Chair) Members of the Vice-Chancellor's Group (excluding the Vice-Chancellor) Where a member has an actual, potential or perceived conflict of interest in relation to a disclosure (i.e. the matters is in relation to themselves or their portfolio), they will be excluded from consideration of that matter and alternative members may be appointed as required.

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Role	Responsibilities
All University Staff	Report suspected instances of fraud, corruption or other improper conduct in accordance with this Procedure. Cooperate with assessment and investigation processes, where required.
Vice-Chancellor's Group (VCG)	Supports the implementation of this Procedure. Promotes an ethical culture and encourages reporting of suspected misconduct. Ensures appropriate actions are taken in response to investigation outcomes within their areas of responsibility.

Part B - Disclosure

What is a Disclosure

(8) A disclosure is a verbal and/or written report from an individual (the Discloser or Reporter) about concerns or suspicions of improper conduct, including unethical practices, fraud, corruption or illegal activities, in relation to the University or its staff (see definitions in section 6 below).

(9) Disclosures will be assessed by the University and managed in accordance with applicable legislation. Further information on the different legislative frameworks is provided via the Report Fraud, Corruption or Improper Conduct SharePoint site.

(10) Matters may also be raised through normal management channels, including through the performance of normal supervisory or oversight functions. Where potential concerns are identified, they must be reported to the Fraud and Corruption Control Officer to be managed under this procedure.

Part C - Making a Disclosure

(11) The University encourages the reporting of suspected fraud and corruption, or other improper conduct.

(12) Individuals are not required to determine whether a disclosure falls within a particular legislative scheme before making a report. All disclosures will be assessed by the University and managed in accordance with applicable legislation.

(13) For VU controlled entities (including VU Online), eligible whistleblower disclosures under the Corporations Act 2001 (Cth) may be made to the Fraud and Corruption Control Officer, who is authorised by the University to receive such disclosures, or to another eligible recipient under the Act.

How to make a disclosure

(14) Disclosures may be made through the following channels:

a. Email: fraud@vu.edu.au
b. Online form: Make a confidential report
c. By phone: 0481 055 253, or
d. In person: Footscray Park campus, Building K, Level 4, Office 420a

Note: Where approved local reporting channels are established for offshore campuses or controlled entities, disclosures may also be made through those channels.

(15) Verbal reports will be accepted and will be followed up with a written statement to ensure proper record-keeping. Disclosures should include, where possible, sufficient information to assist in assessing and investigating the matter, such as details of the conduct, individuals involved, and any available supporting information.

(16) Individuals making a disclosure are encouraged to inform the University if the matter has already been reported to an external body, such as the Independent Broad-based Anti-Corruption Commission (IBAC) or the Victorian Ombudsman, to assist in the appropriate management of the disclosure.

Other reporting Options

(17) Disclosures can also be made to any senior officer of VU, which includes any member of the Vice-Chancellor's Group (VCG), Council members or members of the Leadership Cabinet.

(18) Any disclosure received in this way must be promptly referred to the Fraud and Corruption Control Officer and handled in accordance with this Procedure. Where the disclosure involves the Fraud and Corruption Control Officer, or a conflict of interest otherwise arises, the matter will be managed in accordance with Part H – Conflict of Interest.

(19) Disclosures can be made anonymously. However, anonymity may limit the University's ability to assess and investigate the matter where further information is required.

(20) Disclosers may request that their identity only be disclosed to persons strictly necessary for managing or investigating the matter.

Part D - Receiving, Assessing and Acknowledging Disclosures

(21) The Fraud and Corruption Control Officer will acknowledge receipt of the disclosure and outline the next steps within 5 University working days and undertake an initial assessment to determine the appropriate management pathway.

(22) The initial assessment will determine whether the matter falls within the scope of this Procedure, whether any legislative protections may apply, and whether referral to another University process, legislative scheme or external body is required.

(23) Individuals seeking the protections available under the Public Interest Disclosures Act 2012 (Vic) must make their disclosure directly to IBAC or, where permitted by legislation, the Victorian Ombudsman. The University cannot receive a Public Interest Disclosure on behalf of those bodies.

(24) The Fraud and Corruption Control Officer may, at their discretion, convene the Fraud Disclosure Committee to review disclosures and recommend an appropriate investigation approach. The Committee may request relevant information from appropriate stakeholders to inform its consideration of the disclosure and its recommendations. In appropriate circumstances, a matter may be referred directly to an external investigation at the discretion of the Chair and Deputy Chair.

(25) The Fraud Disclosure Committee is chaired by the Fraud and Corruption Control Officer. Where the Fraud and Corruption Control Officer has an actual, potential or perceived conflict of interest in relation to a disclosure, an alternative Chair will be appointed in accordance with Part H of this Procedure.

Part E - Investigation Process

(26) An impartial and thorough investigation will be conducted. Where a disclosure relates to fraud or corruption, the Fraud and Corruption Control Officer will lead the investigation, and may engage internal or external personnel, or other appropriately qualified individuals or organisations to conduct the investigation where appropriate.

(27) The investigation will follow procedural fairness principles.

(28) Where a disclosure may involve conduct relevant to the Public Interest Disclosures Act 2012 (Vic), or the Independent Broad-based Anti-corruption Commission Act 2011 (Vic), the Fraud and Corruption Control Officer will

consult with the PID Coordinator regarding the University's legislative obligations and the appropriate management pathway.

(29) Where required by law, the University will notify IBAC, the Victorian Ombudsman, or other relevant bodies. The Principle Officer (Vice-Chancellor) is responsible for mandatory notifications under the IBAC Act.

(30) The University will not investigate a Public Interest Complaint unless authorised or directed to do so by IBAC.

(31) Where the Discloser has provided their identity, they will be kept informed of the progress of the investigation and, at its conclusion, notified of the outcome, subject to confidentiality and legal constraints.

Part F - Confidentiality and Protections

(32) Applicable Victorian and Commonwealth legislation may provide legal protections and immunities for eligible whistleblowers, including protections relating to confidentiality, reprisal and liability. The University cannot confer these statutory protections but will comply with its obligations under applicable legislation.

(33) The University will provide appropriate support to individuals who make a disclosure, and to others involved in the disclosure process, including measures to protect from retaliation, harassment, or adverse action. The University will take appropriate corrective action in response to any such conduct.

(34) For disclosures involving offshore operations, the University will provide protections and support measures to the fullest extent permitted by applicable law.

(35) The University will take reasonable steps to protect the identity of a discloser to the extent permitted by law. Information about the disclosure will only be shared with individuals who need to know for the purposes of assessing, investigating or managing the matter.

(36) Confidential and independent counselling and other services are available to VU staff through the Employee Assistance Program (EAP). EAP services are private and confidential. Staff can ring the EAP provider on 1300 EAP AT VU or 1300 327 288.

(37) Individuals who make intentionally false or vexatious reports may be subject to disciplinary action in accordance with the relevant industrial instrument (for staff) or the Student Misconduct Regulations 2019 (for students).

Part G - Outcomes of the Investigation

(38) Where an investigation confirms misconduct or unlawful behaviour, the University will take appropriate action, which may include disciplinary measures, corrective actions, referral to law enforcement or regulatory authorities, and legal proceedings. Disciplinary actions may include dismissal, in accordance with the University's disciplinary procedures and subject to the limitations of relevant enterprise agreements and workplace laws. Other actions may include possible termination of relationship with the University or associate entities or civil action for the recovery of losses on advice of the Office of the General Counsel.

(39) Where an investigation finds no evidence to support the disclosure, the matter will be closed. Where the discloser has provided their identity, they will be informed of the outcome, subject to confidentiality and legal constraints.

Part H - Conflict of Interest

(40) Conflicts of interest will be managed in accordance with the Conflict of Interest Policy to ensure impartiality in the handling of disclosures.

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(41) Where a conflict of interest arises:

a. If a disclosure involves the Chief Risk Officer or their team, the General Counsel (or their delegate) will act as Fraud and Corruption Control Officer.
b. If a disclosure involves a member of the VCG or their team, they will be excluded from the Fraud Disclosure Committee for the purpose of managing that disclosure.

Section 5 - HESF/ASQA/ESOS Alignment

(42) HESF: Standards 6 Governance and Accountability; 7.1 Representation; 7.3 Information Management

(43) Outcome Standards for NVR Registered Training Organisations 2025: 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

(44) 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.

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

(46) 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.

(47) 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.

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

(48) 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).

(49) 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.

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(50) Public Interest Complaint (PIC): A Public Interest Disclosure that has been assessed by IBAC and determined to be a Public Interest Complaint under the Public Interest Disclosures Act 2012 (Vic).

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

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Status and Details

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