SOUTHERN ACADEMY OF
HIGHER EDUCATION

Southern Academy of Higher Education (SAHE)

Fraud Prevention Policy

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1. Policy Statement

The Fraud Prevention Policy (the 'Policy') provides Southern Academy of Higher Education's ('SAHE' or the 'Academy') framework to ensure that all activities of the Academy are free of fraud and malpractice. This Policy is designed to help ensure that fraudulent activities are identified and appropriately managed. This Policy provides a framework to address wrongdoing and to offer support and protection to whistleblowers and those who make voluntary disclosures in accordance with the Public Interest Disclosure Act 1994 (NSW).

1.1 Definitions

For definitions, please refer to the '*Dictionary of Terms*'.

2. Scope

This Policy applies to all:

a. SAHE staff and students;
b. members of the Academy's Governing Council, Academic Board, Course & Industry Advisory Committee and other committees and sub-committees;
c. consultants and contractors and individuals acting in any paid or voluntary capacity for SAHE.

This policy does not apply to an alleged student, academic or research misconduct, which are considered under the *Intellectual Property Policy* and *Academic Integrity Policy*.

3. Policy Principles

SAHE will adopt a multi-faceted approach to deal with fraudulent activities. The key objectives are:

a. the establishment of a counter-fraud culture;
b. maximum deterrence of fraud;
c. active and successful prevention of any fraud that cannot be deterred;
d. rapid detection of any fraud that has not been prevented;
e. to investigate any detected fraud professionally, effectively and thoroughly;
f. effective internal and external actions and sanctions against people found to be committing fraud, including legal action for criminal offences;
g. protecting the integrity of awarding of qualifications;
h. effective communication and learning in relation to fraud; and
i. effective methods of investigation when/where fraud has been perpetrated.

4. Responsibilities

4.1 Governing Council

a. The primary responsibility for fraud prevention and control is with the Governing Council as the governing authority of the Academy. The Dean is responsible to operationalise this Policy at the Academy.
b. The Governing Council will approve and review this Policy in accordance with the *Policy Review Schedule*.

4.2 Risk Management Committee

The Risk Management Committee will:

a. review, evaluate and monitor, on the delegated authority of the Governing Council, this Policy, the *Delegation of Authority Policy* and associated systems and process;

b. advise the Governing Council on the adequacy and effectiveness of the Academy's control environment, including major risks which may impact on the operation or reputation of the Academy and associated risk mitigation mechanisms;
c. facilitate fraud and corruption risk assessments as part of risk management activities and ensure these assessments are conducted in accordance with the *Risk Management Framework*.

4.3 Dean

The Dean will operationalise this Policy and ensure:

a. appropriate internal controls are in place and operating effectively to minimise fraud risks;
b. that staff clearly understand their role and obligations as the first line of defence in the prevention and detection of fraud; and
c. that staff are aware of the mechanisms for reporting incidents of suspected fraud and encourage staff to report any suspected incidents of fraud in accordance with *the Human Resources Management Policy* and other relevant policies.

4.4 SAHE Managers

Staff with managerial roles are responsible for ensuring that:

a. an adequate system of internal control exists within their area of responsibility to minimise the identified risks;
b. undue reliance on specific individuals is avoided - this can be mitigated by job rotation so that more than one member of staff becomes proficient in a particular role;
c. the necessary supervisory procedures and checks are carried out in accordance with the *Delegation of Authority Policy* and the *Quality Assurance Policy*;
d. internal control instructions and reference documents are up to date;
e. staff are adequately trained for the role they perform;
f. the segregation of duties is not compromised during staff vacancies or absences.

4.5 All Staff

All staff must:

a. act in accordance with the *Staff Code of Conduct* when undertaking their duties and representing the Academy;
b. take appropriate action in relation to suspected fraudulent or improper conduct within their area of responsibility;
c. advise the Dean of any concern, suspicion, or information of any instance of fraudulent, corrupt or improper conduct or if the report involves the Dean, advice the Chair of the Governing Council;
d. deal with all reports of suspected fraud or improper conduct professionally and promptly; and
e. co-operate during internal checks, reviews or fraud investigations within the Academy.

5. Examples of Fraudulent Activities

Common types of fraudulent activities in higher education include, but are not limited to:

a. fraud involving cash, physical assets or confidential information;
b. data and data protection fraud;
c. misuse of SAHE accounts;
d. procurement fraud;
e. payroll fraud;
f. credit card and cheque fraud;

g. financial accounting fraud;
h. fraudulent expense claims;
i. abuse of position;
j. conflict of interest and consultancy fraud;
k. reference, qualification and related employment fraud;
l. recruitment and appointment fraud;
m. plagiarism or breach of Intellectual Property (IP);
n. bribery and corruption;
o. academic fraud involving, admissions, admissions documentation and related matters such as fraudulent production of SAHE's certification documentation;
p. academic fraud and misconduct including plagiarism and other forms of cheating (please refer to the *Academic Integrity Policy* for further details);
q. fraudulent activity concerning examinations and awards not covered in the *Academic Integrity Policy*.

6. Prevention and Detection of Fraud

a. SAHE will have an integrated framework of policies and procedures aimed at prevention such as the:
    i. *Risk Management Plan;*
    ii. *Risk Management Framework;*
    iii. *Fraud Prevention Policy;*
    iv. *Academic Integrity Policy;*
    v. *Delegation of Authority Policy*;
    vi. *Records Management Policy*;
    vii. *Staff Code of Conduct*; and
    viii. *Intellectual Property Policy.*
b. Identification, assessment and management of the risk of fraud will be an integral part of SAHE's risk management process, as set out in the *Risk Management Framework* and *Risk Management Plan.*
c. SAHE will implement internal controls enabled by technology in financial, administrative, information systems and academic operations for fraud prevention and detection.
d. The Academy will apply human resource controls such as recruitment procedures in line with the *Human Resources Management Policy* and associated procedures. This will include verification of identity (birth certificate, driver's license), reference checks from the two most recent employers, and verification of formal qualifications.
e. SAHE will establish clear reporting lines, reporting and management of conflicts of interest, segregation of duties, approvals within delegated authority, and performance management as outlined in the *Delegation of Authority Policy*.
f. SAHE will implement financial controls which will include suitable procurement practises, reconciliations, budget control, regular review of financial transaction accounts and limiting authorisation of transactions to specific staff.
g. The Academy will establish technical controls such as security of records and information systems in accordance with the *Records Management Policy*, information and communication technology risk management and cybersecurity controls.
h. All SAHE issued certification documentation will be protected against fraud through a range of measures. Outline of safety measures protecting against fraudulent issues include:
    i. printing testamurs and statements of academic record on paper with security features, such as embossed SAHE seal;
    ii. assigning a unique document number to each testamur issued; and

iii. ensuring the award documentation displays the signature, the name and office of the signatory authorised to issue the award.

i. SAHE will use proactive fraud detection procedures – such as continuous management monitoring using data analysis, computer-assisted auditing techniques, and other technology tools - to detect fraudulent activities as part of the internal audit and external audit reviews.

7. Whistle-blower Protection

SAHE will strive to meet or exceed best-practice standards on whistle-blower protection (including the relevant Australian Standard) and will do the following:

a. require staff to act in good faith and reasonably in making reports under whistle-blower protection;
b. recognise and respect the confidentiality of the identity of a bona fide informant; and
c. ensure support and protection are provided to an informant against any form of recrimination or reprisal or any threat of detriment.

8. Reporting

a. All staff must notify the Dean of any known or suspected form of financial irregularity or fraud activities affecting SAHE's assets, finances, or other resources.
b. All notifications of suspected financial irregularity or fraudulent activities should be made in writing (in strict confidence) to the Dean providing a brief description of the alleged irregularity, the estimated scale of or scope for loss, any evidence supporting the alleged irregularity, and details of the suspected perpetrator (the respondent).
c. If an anonymous allegation is received, it will be considered, but there will be limits on the investigation process depending on the details provided.
d. In recognition of the good faith in which staff may make an allegation of suspected financial irregularity or fraudulent activities, SAHE will protect and support an individual against harassment or victimisation.
e. All allegations will be considered in confidence and so far, as is practicable, the preliminary or full investigation of an allegation shall be carried out in accordance with the principle of confidentiality, to protect the interests both of the initiator and the respondent.

9. Response

a. Fraud and corruption against the Academy may constitute a serious offence under relevant State law and the Academy will fully investigate any allegations of fraud and corruption as soon as the allegation is notified.
b. SAHE will follow disciplinary procedures outlined in the *Staff Code of Conduct* and *Student Code of Conduct* against any member of staff or student who has committed fraud and corruption.
c. SAHE may involve the police and other relevant government agencies or may initiative civil action to recover losses.
d. Investigation of matters by the Academy will follow principles of natural justice. The Academy will appoint individual/s who are impartial and who possess appropriate skill and expertise as part of the investigation process.
e. All suspected incidents of fraud and corruption will be recorded in order to identify trends and prevent a recurrence.

10. Monitoring and Review

Following the detection of fraud, the Dean, in consultation with the Risk Management Committee, will reassess the adequacy of the internal control environment and identify actions to strengthen the controls.

Version Control

Version	v1.4
Review	The Governing Council will review this Policy in accordance with the Southern Academy of Higher Education *Policy Documents Review Schedule*.
Approving Body	Governing Council
Approval and Effective Date	1 December 2022
Policy Custodian	Dean
Policy Contact	Dean
Higher Education Standards Frameworks (Threshold Standard) 2015 (Cth)	B1.1 "Higher Education Provider" Category Standard 1.5, ss 5 Standard 7.3, ss 3
Benchmarking Institutes	Southern Cross University University of the Sunshine Coast Central Queensland University University of New South Wales Federation University James Cook University
Related Document	Academic Integrity Policy Delegation of Authority Policy Dictionary of Terms Human Resources Management Policy Intellectual Property Policy Intellectual Property Policy Records Management Policy Risk Management Plan Staff Code of Conduct

Related Legislations	Higher Education Standards Framework (Threshold Standards) 2021 (Cth) Tertiary Education Quality and Standards Agency Act 2011 Code of Ethics and Conduct for NSW Government NSW Department of Education and Training Code of Conduct Crimes Act 1900 (NSW) Government Information (Public Access) Act 2009 (NSW) Protected Disclosures Act 1994 (NSW) Independent Commission Against Corruption Act 1988 (NSW) Public Finance and Audit Act 1983 (NSW) Crime and Corruption Act 2001 Financial Accountability Act 2009 Financial and Performance Management Standard 2009 Information Privacy Act 2009 Public Sector Ethics Act 1994 Right to Information Act 2009 Standard AS8001-2008: Fraud and Corruption Control