



Corruption and Fraud Prevention Policy

1. Purpose

1.1 The potential for corruption to create reputational and financial damage to WSUIC is high if not properly managed. This policy will reduce this risk and help to ensure that efforts to prevent corruption are coordinated and focused. This policy also confirms the commitment of WSCUI to good corporate governance through corruption prevention initiatives. Its objectives include:

- 1.1.1 To align with Western Sydney University's and Western Sydney University – The College's Corruption and Fraud Prevention Strategy.
- 1.1.2 To prevent and detect corruption across all areas of Western Sydney University International College's (WSUIC) operations, including those of its related entities.
- 1.1.3 To ensure that management is aware of its responsibilities for establishing controls and procedures for the prevention and detection of corruption.
- 1.1.4 To ensure staff are aware of WSUIC's expectation that they will refrain from corrupt conduct, fraudulent activities, and maladministration.
- 1.1.5 To encourage employees to report matters that they suspect may concern corrupt conduct.
- 1.1.6 To provide assurances to staff, students and the wider community that any suspected corruption will be fully investigated and sanctions imposed.

2. Definitions

For the purposes of this policy, the following definitions apply:

'Corruption'

As defined by the Independent Commission Against Corruption includes:

- a) any conduct of any person (whether or not a public official) that adversely affects, or that could adversely affect, either directly or indirectly, the honest or impartial exercise of official functions by any public official, any group or body of public officials or any public authority, or
- b) any conduct of a public official that constitutes or involves the dishonest or partial exercise of any of his or her official functions, or
- c) any conduct of a public official or former public official that constitutes or involves a breach of public trust, or
- d) any conduct of a public official or former public official that involves the misuse of information or material that he or she has acquired in the course of his or her official



functions, whether or not for his or her benefit or for the benefit of any other person.

Section 8, Independent Commission Against Corruption Act (1988)

'Fraud'

Is a subset of corruption and can be defined as "a deliberate and premeditated turn of events which involves the use of deception to gain advantage from a position of trust and authority.

The type of events include: acts of omission, theft, the making of false statements, evasion, manipulation of information and numerous other acts of deception"

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The definition of Fraud, for example, includes:

- a) alteration or creation of false examination results
- b) production of false academic transcripts
- c) theft of Western Sydney University, Navitas or WSUIC property
- d) unauthorised access to or misuse of Western Sydney University, Navitas and WSUIC IT systems
- e) receiving commissions in contracting goods or services
- f) falsification of staff allowances and staff time sheets
- g) misuse of WSUIC Corporate Card (for personal purchases)
- h) improper use or abuse of Western Sydney University and WSUIC assets for private business
- i) use of false documents to obtain student ID cards or advanced standing
- j) misuse of grants or designated research funds
- k) theft of Intellectual Property

3. Scope and Principles

- 3.1 This policy will cover all WSUIC staff and students and all areas of WSUIC's business including its academic, administrative and commercial activities.
- 3.2 WSUIC will not tolerate corrupt conduct by its employees or its students and is committed to minimising, investigating and reporting such conduct.
- 3.3 WSUIC is committed to taking a risk management approach to the identification and management of corruption risks.
- 3.4 WSUIC will comply with requests made by Western Sydney University and/or Navitas for the purpose of implementing anti-fraud corruption strategy across the broader Western Sydney University or Navitas community.



- 3.5 Executive management will be encouraged to promote corruption prevention in their respective areas of responsibility through a series of training and awareness-raising programs.
- 3.6 Quarterly reports will be prepared by the Executive Management Team detailing fraud and corruption incidents for each operation area. These reports will be tabled at each Executive Committee meeting.
- 3.7 Fraud and Corruption controls are embedded into the WSUIC's various policy and procedure documents. These policies and procedures are a critical part of the WSUIC's broader governance and risk management framework and outline actions required to reduce the WSUIC's exposure and vulnerability to Fraud and Corruption.
- 3.8 The objectives of this policy will be achieved through the ongoing implementation of processes defined in these policies and procedures.
- 3.9 Executive Management will provide an annual report in November to Risk and Compliance Committee detailing any fraud and corruption incidents.

4. Communication

- 4.1 The responsibilities of staff as defined in documents such as WSUIC Code of Conduct and as prescribed by regulatory agencies such as the Independent Commission Against Corruption will be regularly communicated to staff i.e. through training, email communications, International College intranet pages, notice boards, pamphlets and publications.

5. Risk Assessments

- 5.1 WSUIC will cooperate with Western Sydney University Audit and Risk Assessment Unit with the conduct of regular corruption risk assessments as part of its cyclical risk profiling program. The outcomes of these assessments will be used to guide the development of the annual Western Sydney University Audit and Risk Assessment Work Plan, in particular its Computer Assisted Auditing Techniques (CAATS) program.

6. Code of Conduct

- 6.1 The [Western Sydney University International College Code of Conduct](#) clearly outlines a staff member's responsibility to report corruption.
- 6.2 All staff (including casual and contract staff) will be reminded of the need to comply with the Code of Conduct on an annual basis. The effectiveness and accessibility of the Code (as it pertains to corruption prevention initiatives) will also be subject to review every two years.

7. Induction and Recruitment

- 7.1 All new staff (including casual and contract employees) will be provided with a copy of the Western Sydney University International College Code of Conduct and advised of their obligation to comply with it.



8. Raising Awareness

- 8.1 Management and staff will be kept informed of the latest fraud and corruption issues as identified by external agencies such as the Audit Office of NSW and the Independent Commission Against Corruption.
- 8.2 Promotional materials such as fraud alerts, publications, posters and brochures will be distributed to all staff in order to raise staff awareness.

9. Training

- 9.1 Courses and seminars on the topic of corruption prevention and detection will be made available to all employees on a regular basis.

10. Incident Documentation

- 10.1 A register of corruption incidents will be maintained by the WSUIC Director of Quality and Student Administration and the relevant authorities will be informed.

11. Responsibilities

11.1 College Director and Principal

The College Director and Principal is responsible for ensuring that an effective Corruption Prevention Strategy is in place and to promptly advise the Board of any corruption or fraud incident within WSUIC. The College Director and Principal is responsible for ensuring that the effectiveness of the strategy is regularly assessed and that the outcomes of this assessment are communicated to the Senior Management Team and the WSUIC Board of Directors.

11.2 WSUIC Executive Management Committee

The WSUIC Executive Management Committee is responsible to the College Director and Principal for supporting the policy and the implementation of related activities designed to minimise corruption risks.

11.3 All WSUIC Staff

The requirement that the College Director and Principal, in consultation with the University, report corrupt conduct and suspected corrupt conduct to agencies such as the Independent Commission Against Corruption is clearly defined in legislation i.e. specifically [Section 11, Independent Commission Against Corruption Act \(1988\)](#). On that basis this policy does not create new responsibilities – it will however ensure that staff are aware of their responsibilities and that the necessary administrative systems and support mechanisms are in place in order for staff to fulfil them.



12. Reporting Corruption

- 12.1 Staff and students will be encouraged to report corruption in the first instance to their supervisor/manager. The option of reporting to the Independent Commission Against Corruption, Audit Office of NSW or NSW Ombudsman Office will also be communicated.
- 12.2 Contractors/suppliers and members of the public will also be encouraged to report corruption to the College Director and Principal or advised of the option to report the matter to the Independent Commission Against Corruption; the Audit Office of NSW or NSW Ombudsman Office.

13. Quality and Compliance

- 13.1 This policy and procedure is reviewed periodically (at a minimum every two years) to ensure regulatory compliance, operational currency, the identification of continuous improvement opportunities and risk identification and mitigation.

14. Relates Policies, Procedures, Guidelines and Legislation

- ☐ Code of Conduct
- ☐ [Section 11, Independent Commission Against Corruption Act \(1988\).](#)

15. Related Contacts

- [Independent Commission Against Corruption](#)
- [Audit Office of NSW](#)
- [NSW Ombudsman](#)

Amendment History

Approval Authority:	WSUIC Joint Venture Board /Company Secretary
Approval Date:	1 October 2016
Date for Next Review:	12 September 2025



Revision Date	Version	Summary of changes
21/10/2016	1.0	New Policy Developed and Implemented
23/8/2019	2.0	Minor wording, numbering, grammatical changes made throughout Policy for clarity. Added in Clause 1.1 to replace Section 3.
12/9/2023	2.0	Minor wording, numbering, grammatical changes made throughout Policy for clarity.