

Fraud & Mismanagement Policy

1. Purpose

- 1.1 This policy provides a framework for protecting Perth Bible College from fraud or mismanagement, including corruption or improper conduct. The policy encourages a culture of the highest ethical and professional standards in which fraud and corrupt conduct will not be tolerated or ignored. This policy is also to encourage staff to be vigilant in ensuring these standards are met and provides guidance for action if it is suspected that the standards are being breached.

2. Scope

- 2.1 This policy applies to all staff of Perth Bible College.

3. Responsibility

- 3.1 It is the responsibility of the Principal for the implementation of this policy.

4. Definitions

<i>Corrupt Conduct</i>	<p>Corrupt Conduct includes:</p> <ul style="list-style-type: none"> • An employee or other person acting in a dishonest or improperly partial manner in relation to the affairs of Perth Bible College, • The misuse of information that may become accessible through employment, attendance or other engagement at the College, whether the information is of an academic or non-academic nature, • Intentional failure to disclose a conflict or a potential conflict of interest, and • A conspiracy or an attempt to commit fraud or act corruptly.
<i>Fraud</i>	<p>An act of deliberate deception, misinterpretation or omission committed with the intention of gaining an unjust advantage or to cause an unjust loss or disadvantage. This includes fraudulent or corrupt conduct by any person, including theft of tangible or intangible assets.</p> <p>Fraud includes, but is not limited to:</p> <ul style="list-style-type: none"> • Breaches and attempted breaches of the law in relation to anything tangible or intangible,

	<ul style="list-style-type: none"> • Misappropriation of the tangible or intangible assets of the College, • Inappropriate reimbursement of expenses or unauthorised payments to third parties, • Theft, including theft or misuse of intellectual property, and/or <p>Inappropriate exertion of influence or coercion to act in a manner that is not in the College's best interest.</p>
<i>Improper Conduct</i>	<p>Improper conduct is conduct that is corrupt, including:</p> <ul style="list-style-type: none"> • the substantial mismanagement of resources, or • conduct involving substantial risk to the health or safety of others or to the environment, or • conduct inappropriate for a Christian (see Professional ethics section of the Staff and Faculty Manual, and guidelines in the Students Handbook). • The conduct must be serious enough to constitute, if proved, a criminal offence or reasonable grounds for dismissal.

5. Policy Provisions

Principles

5.1 As a Christian tertiary institution, Perth Bible College upholds the importance of honesty and integrity in all of its operations. The Board of Perth Bible College considers fraud, corruption and improper conduct seriously and will not tolerate such behaviour.

5.2 This Policy espouses Perth Bible College's values of:

5.2.1 Academic Integrity:

5.2.1.1 ensuring its courses, qualifications and awards comply with relevant standards;

5.2.1.2 ensuring that students only receive credit where credit is due; and

5.2.1.3 ensuring that awards are only bestowed after due approval.

5.2.2 Financial Integrity:

5.2.2.1 ensuring all its financial dealings are legal, honest, ethical and open to scrutiny;

5.2.2.2 ensuring all financial transactions are verifiable and duly authorised; and

5.2.2.3 ensuring that policies and safeguards are in place to prevent theft or fraud.

5.2.3 Operational Integrity:

5.2.3.1 ensuring that all reasonable diligence and care is taken to ensure that in its other operations the College complies with all legal requirements and obligations; and

5.2.3.2 ensuring that the College operates in an ethical and responsible manner in every area towards its employees, students, other stakeholders and the environment.

Policy Objectives

5.3 The objectives of the Fraud Prevention Policy and accompanying procedure are to:

5.3.1 provide a clear statement to employees that fraudulent, corrupt or improper conduct is not acceptable and will not be tolerated;

5.3.2 ensure that employees and management are aware of their responsibilities for identifying and reporting fraudulent, corrupt or improper activities;

5.3.3 establish controls and procedures for preventing fraudulent, corrupt or improper activities and/or detecting such activities if they occur;

5.3.4 encourage a culture that supports employees reporting conduct they suspect may be fraudulent, corrupt or improper;

5.3.5 reduce opportunities for fraudulent, corrupt or improper conduct;

5.3.6 ensure that appropriate action is taken if fraud, corruption or improper conduct is detected;

5.3.7 establish an effective fraud reporting system;

5.3.8 provide guidance to ensure that adequate investigation standards are followed;

5.3.9 provide guidance to employees as to what is required when suspicion is aroused of activities that may be fraudulent or corrupt; and

5.3.10 provide safety, protection and guidance to employees in circumstances where they are/could be victimised as a result of reporting, investigating or being a witness to fraudulent, corrupt or improper activities.

6. Policy Information

Date first approved: 28/03/2014	Date of effect: 12/01/2019	Date last amended: 23/09/2019	Date of next review: Sep 2022
Approved by		Board of Management	
Authorised Officer		Principal	
Supporting documents, procedures & forms of this policy		<i>Fraud and Mismanagement Procedure</i>	
Related Legislation and Codes of Practice		Higher Education Standards Framework 2015, Part A: Standard 6 Tertiary Education Quality and Standards Agency (TEQSA) Act 2011	
Audience		Public	

7. Version History

Review Table			
Date	Review Type <ul style="list-style-type: none"> Scheduled Policy amendment Admin update 	Summary of Changes	Review person/group
28/3/14	Initial Issue		Adam Niven, David Smith, BoM
14/2/18	Scheduled	Minor language and number level adjustments to ensure clarity	David Smith, Hanlie van Rooyen
05/08/2019	Policy amendment	New template and amendments made.	Natalie Tierney Capital Review Group consultant