

Corruption, Fraud and Mismanagement Policy

Purpose

1. This Policy outlines the principles underlying Global Higher Education's (GHE) approach to the management of corruption, fraud and mismanagement and in so doing how GHE meets the standards outlined in Domain 6, Governance and Accountability, of the *Higher Education Standards Framework (Threshold Standards) 2021*.

Scope

2. This Policy applies to all GHE staff.
3. The conduct of Board and committee members is managed under the provisions in the relevant Terms of Reference and the **Board Appointment, Renewal and Removal Policy**.
4. Allegations of misconduct by a student are managed under the provisions of the **Student Non-Academic Conduct and Misconduct Policy**.

Definitions

5. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

Suite documents

6. This Policy is linked to the Corruption, Fraud and Mismanagement Procedure.

Policy

Principles

7. For the purposes of this Policy:
 - a) 'mismanagement' means a substantial failure to properly manage staff or resources; management practices that involve substantial risk to public health or safety or to the environment; conduct that is not line with the GHE's values, policies and procedures;
 - b) 'corrupt conduct' means the improper use of influence or position and/or improper use of information or other improper omissions of a similar nature to gain an advantage or economic benefit;
 - c) 'fraud' means the deliberate deception to secure unfair or unlawful gain by electronic or other means, abuse of company resources or time.
8. Mismanagement may arise from a staff member's incompetence, inexperience and/or lack of training through to more serious intentional practices. Responses to mismanagement will vary according to the findings of any related investigations and could range from remedial to more serious responses as outlined in the **Human Resources Framework**.
9. Fraud and corruption are offences under various State and Commonwealth legislation and individuals found engaging in such activities can face criminal charges. Fraud or corruption may also breach professional standards and codes and be subject to procedures by professional bodies.

10. GHE will not tolerate mismanagement, fraudulent activities, or corrupt conduct. In ensuring an appropriate culture for the organisation GHE will:
 - a) expect and encourage ethical conduct by all members of the community, according to the Staff Code of Conduct in the **Human Resources Framework**;
 - b) develop controls and strategies for the prevention and detection of mismanagement, and corrupt and fraudulent activities;
 - c) ensure that employees are aware of their responsibilities for identifying mismanagement, corrupt or fraudulent activities;
 - d) foster a culture that supports the reporting of suspected fraud or improper conduct, and aims to provide safety, protection and guidance for those individuals who report such conduct;
 - e) carefully investigate and manage all detected and reported cases of such activities;
 - f) ensure confidentiality in relation to suspicions or allegations of corruption, fraud and mismanagement;
 - g) ensure natural justice and fair and unbiased processes in the investigation and resolution of any allegations.
11. GHE considers that its fraud, corruption and mismanagement control program is an integral component of its risk management strategy which is overseen and monitored by the Audit and Risk Committee.
12. The Board of Directors is ultimately responsible for the establishment of an ethical organisational environment within GHE and for the proper handling of any allegations of corruption, fraud or mismanagement.

Associated information

Related Internal Documents	<p>Corruption, Fraud and Mismanagement Procedure Board Appointment, Renewal and Removal Policy Conflict of Interest Policy Delegation of Authority Policy and Schedule Financial Framework Governance Framework Human Resources Framework Intellectual Property and Copyright Policy Risk Management Policy Student Academic Integrity and Academic Misconduct Policy Student Non-Academic Conduct and Misconduct Policy Glossary of Terms</p>
Related Legislation, Standards and Codes	<p><i>Tertiary Education and Quality Standards Agency Act 2011</i> <i>Higher Education Standards Framework (Threshold Standards) 2021</i> <i>Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)</i> <i>Corporations Act 1990 (SA)</i> <i>Corporations Act 2001 (Cth)</i> <i>Crimes Act 1914 (Cth)</i> <i>Independent Commissioner Against Corruption Act 2012</i> <i>Criminal Code Act 1995 (Cth)</i> <i>Criminal Law Consolidation Act 1935 (SA)</i> <i>Public Finance & Audit Act 1987 (SA)</i> <i>Surveillance Devices Act 2016 (SA)</i> <i>Tertiary Education Quality Standards Agency Act 2011 (Cth)</i> <i>Public Interest Disclosure Act (SA)</i> <i>National Security Legislation Amendment (Espionage and Foreign Interference) Act 2018</i> TEQSA Guidance Notes: <i>Corporate Governance</i>, Version 2.4</p>
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Change history

Version Control	Version 1.2	
Change Summary	15-Apr-20	V1.0 Draft approved by Board of Directors (BoD) 1 May 2020
	23-July-20	V1.1 Administrative updates
	9-Oct-23	V1.2 administrative updates following TEQSA registration

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