



# Prevention of Fraud and Misconduct Policy and Procedure

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## 1 PURPOSE

- 1.1 The Polytechnic Institute Australia ('PIA') is committed to ensuring that fraud and misconduct are prevented wherever possible, and that the response to instances of alleged fraud and misconduct is effective, efficient, and appropriate.

## 2 SCOPE

- 2.1 This policy and procedure applies to all PIA's students and staff.

## 3 POLICY STATEMENT

- 3.1 PIA recognises that the prevention of fraud and mismanagement is essential for good governance. PIA does not tolerate fraud and corruption, and is committed to ensuring that effective prevention of fraud and mismanagement measures are integrated into all Institute activities.

### Objectives

- 3.2 The objectives of this policy and procedure are to:
- foster an ethical culture throughout the organisation;
  - protect PIA's interests, assets and reputation;
  - protect the reputation of Australian qualifications;
  - provide a transparent and coordinated approach to dealing with suspected fraud and corrupt activities; and
  - encourage, support and protect persons who report suspected fraud or misconduct. Examples of Fraud and Misconduct
- 3.3 Examples of fraudulent behaviour and acts of misconduct include:
- Breaches in the student code of conduct;
  - Breaches in the staff code of conduct;

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- bribery;
- improperly handling or reporting financial transactions;
- improper use of influence, power, and/or position;
- theft or misappropriation;
- unauthorised or improper use of assets, data, facilities, equipment, materials, records or information;
- falsification or unauthorised alteration of data, records or documents; and
- failing to declare a conflict of interest.

### 4 PROCEDURES

#### Controls and Checks

- 4.1 The Chief Executive Officer (CEO) and the Executive Management Committee are responsible for the implementation of this policy through an appropriate internal control structure which includes:
- rigorous and transparent procedures for recruiting staff and Education Agents;
  - securing all financial, personnel and student records;
  - securing information and management systems;
  - financial controls, such as budget controls, internal audit and reconciliations;
  - designated delegations of authority for approvals; and
  - distinct reporting lines and supervision.
- 4.2 Senior management are responsible within their organisational areas to ensure that:
- controls and procedures are in place to prevent and detect any fraudulent or corrupt activities;
  - they are in a position to identify and assess the risk of fraud and corruption;
  - staff are aware of PIA's policy on fraud and misconduct, and their obligations for ethical conduct in their duties; and
  - staff are encouraged to report promptly any suspicions of fraudulent or corrupt activities.

#### Prevention and Deterrence

- 4.3 Measures taken to prevent fraud and misconduct include:
- assessment of the risk of fraud and misconduct in each organisational area within PIA, and to the Institute as a whole;
  - regular review and updating of the Risk Register;
  - conducting regular workshops and information sessions on academic misconduct, plagiarism, and acceptable academic approaches;
  - promoting a culture of transparency, responsibility and ethical behaviour; and
  - communicating expectations and requirements to staff and students via relevant policies, procedures, and

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Codes of Conduct.

## Detection and Reporting

- 4.4 PIA undertakes regular audits of financial activity, management practices and processes, and information systems in order to detect any fraudulent activity. Audits are conducted both internally and through external agents. Academic misconduct is closely monitored via plagiarism detection software.
- 4.5 All staff have a responsibility to undertake their duties ethically. Any staff member who suspects fraud or corrupt activity has a responsibility to report it. Where any staff member is aware of or suspects fraudulent or corrupt activities they must report these suspicions immediately.
- 4.6 Students may report suspicions of fraudulent or corrupt activities.
- 4.7 PIA will assess and investigate all allegations of fraud and, where official misconduct is suspected, these matters will be referred to the police.
- 4.8 All PIA officers who are involved in or become aware of an investigation into possible fraud or misconduct must keep the details and results of any investigation confidential.
- 4.9 Allegations of fraud or misconduct will be taken seriously and handled with due regard for the protection of those making the allegation, as well as ensuring natural justice for those individuals against whom an allegation has been made.
- 4.10 A full investigation will be undertaken where the behaviour warrants dismissal and/or criminal prosecution.
- 4.11 If an investigation into an allegation finds that fraud or misconduct did occur, the consequences will depend on the extent, nature and severity of the behaviour.

## 5 RESPONSIBILITIES

- 5.1 All members of the PIA community are expected to adopt, promote and demonstrate ethical behaviour. Individuals must be responsible for their own behaviour and they must support others in adopting ethical practices.

## 6 DEFINITIONS

- 6.1 Terms not defined in this document may be in the PIA glossary.

## 7 RELATED LEGISLATION AND DOCUMENTS

### Documents

Copyright Policy  
Education Agents Policy and Procedure  
Staff Code of Conduct  
Student Academic Integrity and Honesty Policy and Procedure  
Student Code of Conduct  
Student Grievance Handling Policy and Procedure

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## Higher Education Standards Framework

- 7.1 This policy and procedure complies with the Higher Education Standards Framework (Threshold Standards) 2015, Standard 5.2, which states:
1. There are policies that promote and uphold the academic and research integrity of courses and units of study, research and research training activities, and institutional policies and procedures address misconduct and allegations of misconduct.
  2. Preventative action is taken to mitigate foreseeable risks to academic and research integrity including misrepresentation, fabrication, cheating, plagiarism and misuse of intellectual property, and to prevent recurrences of breaches.
- 7.2 This policy and procedure also complies with the Higher Education Standards Framework (Threshold Standards) 2015, Standard 6.2, which states:
1. The provider is able to demonstrate, and the corporate governing body assures itself, that the provider is operating effectively and sustainably, including:
    - d. the financial position, financial performance and cash flows of the entity are monitored regularly and understood, financial reporting is materially accurate, financial management meets Australian accounting standards, effective financial safeguards and controls are operating and financial statements are audited independently by a qualified auditor against Australian accounting and auditing standards;
    - e. risks to higher education operations have been identified and material risks are being managed and mitigated effectively.

## 8 FEEDBACK

- 8.1 PIA staff and students may provide feedback about this document by emailing [policy@pia.edu.au](mailto:policy@pia.edu.au).

## 9 APPROVAL AND REVIEW DETAILS

Approval and Review	Details
Approval Authority	Board of Directors
Administrator	CEO

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